



Accrediting Commission of Career Schools and Colleges

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May 8, 2025

ELECTRONIC DELIVERY

██████████
Vice President

Aviator College of Aeronautical Science & Technology
3800 Saint Lucie Boulevard
Fort Pierce, Florida 34946

School #M060148
Probation Order

Dear ██████████:

At the February 2025 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue Aviator College of Aeronautical Science & Technology (“ACAST”) located in Fort Pierce, Florida on Warning. Upon review of the November 26, 2024 and December 4, 2024 Warnings and the school’s responses to those letters, the Commission voted to place ACAST on **Probation** with a subsequent review scheduled for ACCSC’s **August 2025** meeting. The reasons for the Commission’s decision are set forth below. The Commission also reviewed the complaints submitted by ██████████ and ██████████ and determined to continue the review of items raised in those complaints.

History of the Commission’s Review:

On April 2, 2024, ACAST notified the Commission of material events involving injurious and fatal accidents. ACCSC requested additional information from ACAST in an April 3, 2024 letter and ACAST responded to the request on April 19, 2024. Additionally, information regarding the material events is available via National Transportation Safety Board (“NTSB”) Preliminary Reports regarding the August 17, 2023 and March 30, 2024 incidents.

May 2024 Meeting Review and Action on Incident Report:¹

History Part I – Material Events

ACAST’s April 2, 2024 notification of material incident details two fatal and injurious incidents at the school:

- A March 30, 2024 crash resulting in 1 fatal injury and 1 serious injury and
- An August 17, 2023 crash resulting in 1 fatal injury and 1 serious injury.

The Commission found that while the school informed ACCSC of the March 30, 2024 incident within 10 days,² this notification did not excuse ACAST’s past failure to provide the required notification regarding the August 17, 2023 incident. In this case, the school’s failure to timely notify ACCSC of a serious incident prevented the Commission from assessing the matter and initiating an inquiry as to the school’s compliance with accreditation and safety standards and other regulatory requirements.

Upon learning of the incidents described above, the Commission directed ACAST to demonstrate that all machinery and equipment is properly maintained and provided with proper safety devices, which are in working order and used whenever the machinery and equipment is operated (*Section II (A)(5)(d)*,

¹ The full details of the Commission’s review and decision from the May 2024 meeting are captured in the May 15, 2024 Commission Letter.

² Accrediting standards state that each accredited school must notify ACCSC of any material event or circumstance that will or could affect the school’s operations, policies, staff, curricula, reputation, approval status or authority to operate as a legal entity, or financial status. Such notification must be in writing, made within 10 calendar days of the event’s occurrence, and is in addition to disclosures that are required in the applications for initial or renewal of accreditation or any substantive change report (*Section V (E)(1), Rules of Process and Procedure, Standards of Accreditation*).

Substantive Standards, Standards of Accreditation). The school provided two NTSB reports with the following information:

- The NTSB Preliminary Report of the March 30, 2024 Incident appears to catalog important mechanical issues such that the Commission questioned whether they have been subject to routine evaluation and maintenance. The Commission noted its interest in reviewing documentation of the school's ongoing safety and maintenance activities including those maintenance activities referenced below.
- The NTSB Preliminary Report of the August 17, 2023 Incident appears to catalog an instructor's decision to perform a non-required maneuver that then led to acute mechanical failure and serious and fatal injuries which raised questions as to the school's safety culture.

ACAST's April 19, 2024 Response also describes changes to the school's safety and maintenance operations following the August 17, 2023 and March 30, 2024 incidents.

The Commission stated its interest in reviewing documentation of the school's efforts, implementation, and also the school's documentation of its baseline safety operations and the consistency of its efforts to maintain a learning environment that treats student/faculty safety and wellbeing as paramount. The Commission held that a culture of safety should be a consistent and serious endeavor particularly in an industry where risk of injury or fatality has a higher likelihood when diligence is not central to school operations. The Commission additionally questioned why certain practices were not in place previously regardless of whether such practices are required by the Federal Aviation Administration ("FAA").

Based on its review at the May 2024 meeting of the school's response in regard to student safety, emergency preparedness, physical facilities, the Commission directed the school, *inter alia*, to:

- Document its approach to safety and maintenance both before and after the incidents;
- Demonstrate that the school's student services program encompasses student safety and well-being (*Section VI (A)(3)(b), Substantive Standards, Standards of Accreditation*);
- Show that the school's written Emergency Preparedness Plan includes appropriate emergency scenario identification and concordant action plans (*Section I (G)(3), Substantive Standards, Standards of Accreditation*); and
- Provide a written description of the incidents and to show any additions/revisions to the school's Emergency Preparedness Plan or other safety policies/training as a result of these events as necessary.³

History Part III – Anonymous Complaints

On April 22, and 29, 2024, the Commission received two anonymous complaints. The complaints allege that ACAST may not be in compliance with the Commission's standards in the areas of ownership, management, and administrative capacity, financial responsibility, instructional materials and equipment, program design, program length, enrollment agreements, educational administration, faculty qualifications, student services, and complaints. The Commission requested ACAST's response to the complaints.

History Part IV – Institutional Cease Enrollment

The questions and concerns raised during the May 2024 review as captured in the May 15, 2024 Commission letter with regard to the school's maintenance and safety operations created heightened awareness of the safety of the school's current student body. Moreover, ACAST's failure to notify ACCSC

³ The school must have a written emergency preparedness plan that is made available to all staff, faculty, and students, and includes emergency scenario identification and concordant action plans, evacuation and lockdown procedures, communication protocols for sharing information with appropriate parties during and following an incident, orientation for students, and regular training for staff and faculty (*Section I (G)(3), Substantive Standards, Standards of Accreditation*).

in a timely manner as required prevented the Commission from undertaking a timely review of pertinent information in these areas. Thus, in order to allow for the review of this information and to put a check on student safety concerns, the Commission directed the school to Cease Enrollment for a period of time to be determined through the remainder of the review of these issues.

August 2024 Meeting – Commission Review, Findings, and Directives⁴

At the August 2024 meeting, the Commission considered the following:

- The May 15, 2024 Warning and Institutional Cease Enrollment Directive,
- The June 23, 2024 On-Site Evaluation Report,
- ACAST's respective July 3, 2024 and July 2024 Responses to those letters, and
- ACAST's August 1, 2024 update to its July 3, 2024 response.

The Commission communicated its concern with regard to the safety of ACAST's students and ACAST's ability to institute a culture of safety remains central to the Commission's range of concerns regarding the school's compliance with multiple accrediting standards, including minimally those relating to student services, emergency preparedness, instructional equipment, and physical facilities.

The Commission noted ACAST's initiatives and efforts to implement improvements in the context of ACCSC's expectation to see documentation of such progress. Even so, the Commission was gravely concerned by the FAA's findings; unsafe plane operations, and the non-ability to redress or address them along with another accident, possible and near violations of FAA regulations, and non-cooperation with the FAA are serious issues regardless of any finding of regulatory violation. The Commission maintained a strong interest in the FAA's response to the school's efforts and any additional findings, inspections, scrutiny, or correspondence from the FAA.

The Commission further communicated 26 areas of continued concern in its November 26, 2024 Warning. The issues range from systematic issues in administrative capacity and the school's ability to meet its obligations to students to leaves of absence and transfer of credit.

November 2024 Meeting – Commission Review, Findings, and Directives⁵

At the November 2024 meeting, the Commission reviewed the following:

- September 13, 2024 Commission Warning Letter with Institutional Cease Enrollment Directive and
- ACAST's October 21, 2024 Response.

Upon review of the above, the Commission voted to:

- Continue ACAST on Warning with the findings expressed to be aligned and merged with the Commission's concurrent findings from the August 2024 meeting,⁶ all of which to be reviewed at ACCSC's February 2025 meeting;
- Lift its previous Cease Enrollment Directive; and
- Cap ACAST's enrollment.

⁴ The full details of the Commission's review and decision from the August 2024 meeting are captured in the September 13, 2024 Commission letter.

⁵ The full details of the Commission's review and decision from the November 2024 meeting are captured in the December 4, 2024 Commission letter.

⁶ See the November 26, 2024 Warning.

The safety of ACAST's students and ACAST's ability to institute a culture of safety remains central to the Commission's range of concerns regarding the school's compliance with multiple accrediting standards. The Commission noted that the school clearly is attempting to prioritize safety initiatives and understands that this process will take time.

The school's efforts following the noted incidents provided the Commissions with a minimally adequate level of trust regarding improvements with safety initiatives. Accordingly, the Commission determined to lift its Cease Enrollment Directive but to place ACAST on a Cap Enrollment Directive whereby ACAST cannot not have an enrollment in excess of 112 students in the Aeronautical Science (AOS) degree program and 35 students in the Commercial Pilot (Certificate) program (a total of 147 students) at any time. The enrollment cap directive was meant to allow the school to focus on its safety initiatives and to continue scaling and promoting student safety and progress through the educational programs.

February 2025 Meeting – Commission Review, Findings, and Directives

The Commission noted that the school's January 23, 2025 Response references the Hallmarks of Quality from the *Standards of Accreditation* multiple times such as:

- This collaboration will support institutional efforts to satisfy all of the Commission's Hallmarks of Quality (pg. 6);
- This clarity and opportunity to design a process that aligns with standards is intended to help each department demonstrate its own individual hallmarks of quality (pg. 8); and
- These improvements will positively impact areas like [a] more holistic understanding of the Hallmarks of Quality to ensure ongoing alignment with each of these areas and renewed focus on what each individual, each department, and the College as a whole can do to support the achievement of these goals (pgs. 96-97)

While the school references these concepts, the Commission has found that, in practice, the school is not exhibiting them. The Commission's accreditation process focuses on inputs (the kinds of students in the school and the recruiting, admission, and testing procedures that produce them); resources (instructors, equipment, library, etc.), processes (how the school actually operates), and outcomes (how well does the school meets its mission to adequately train students to be prepared to successfully enter the workforce). The Commission believes that both the inputs and the outcomes are essential factors in institutional and student success and as such expects that schools comply with both the input and outcome standards. Given the number of ongoing concerns persisting over six months and the school's inability to provide information across internal departments, the Commission has determined that the school is not meeting these expectations and is not in compliance with several standards as cited below.

The Commission reminds ACAST that the burden rests with the school to establish it is meeting all requirements of the *Standards of Accreditation*. Moreover, the Commission's deliberations and decisions are made on the basis of the written record of an accreditation review and, accordingly, the school must supply the Commission with complete documentation of the school's compliance with all accrediting standards and requirements if the school is to maintain accreditation. As such, the Commission directs ACAST to provide a thorough and complete response with documentation to each of the items listed below. Overall, the burden rests with the school to show that it is meeting its mission, serving students, and meeting all requirements of the *Standards of Accreditation* in order to maintain ACCSC accreditation.

The Commission determined that ACAST is out of compliance with the standard(s) as listed in this letter in Items 1 through 23. Items 24-26 represent areas where the Commission has expressed continued concern but has not yet made a finding of non-compliance.

Areas of Non-Compliance:

1. ACAST did not demonstrate that the school maintains its ability to meet its obligations to students on an ongoing basis (*Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation*). Previously the Commission stated that such consistent and lengthy delays are not tenable. ACAST's previous response iterated its action plan to address this concern. The Commission explicitly expressed its expectation for the number of students progressing on track and "on time" to improve.

When comparing the summary from the July 3, 2024 Response to the January 23, 2025 Response, the Commission found the following:

Response Date	Total Students	On-time	0-45 days behind	45-90 days behind	100+ days behind
July 2024	135	13	29	30	63
January 2025	113	6	4	0	103

The school's most recent breakdown by rating follows (January 23, 2025 ACAST Response, pg. 2):

Rating	Total Students	On-time	0-45 days behind	45-90 days behind	100+ days behind
Private Pilot	20	0	0	0	20
Instrumental	46	1	4	0	41
Commercial	47	5	0	0	42

Overall, the numbers did not improve; while the total number of students decreased, the total number of students not on track by more than 100 days increased. According to the data provided, 91% of current students are more than three months behind in completing their program. Not only did the school's performance fail to improve, but the figures also appear to have worsened to an unacceptable level.

ACAST indicated that the school's new chief pilot determined to not implement the school's previous plan to implement a block scheduling system. The new chief pilot also extended the schedule bid time and created a requirement for minimum flight times for each student. The school is also hiring a Flight Operations and Scheduling manager whose role of ensuring flight time minimums is currently being completed by check airmen. The school's new chief pilot restructured flight assignments and discovered a wide range of practices in assessment and took action to address the discrepancies. The school believes that the holidays and the newness of the chief pilot have prevented the school from making an impact in this area and also stated that the assessment of the factors affecting timeliness took time and is still ongoing.

Despite any efforts by the school, the Commission has determined that it is unacceptable and not in compliance with *Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation* for the school to have fallen so far behind in a fundamental aspect of education, such as providing timely instruction to its students.

Accordingly, the Commission directs ACAST to submit the following information:

- a. A completed ACCSC [Institutional Teach Out Plan Approval Form](#);
- b. An updated Schedule Chart;
- c. For each student more than 100 days behind schedule, the following information:

Student ID#	Program/ Rating	Start Date	Original Estimated Graduation Date	Updated Estimated Graduation Date	# of Days Behind Schedule

- d. An update on the school's initiatives to improve the equity of scheduling opportunities;
- e. An update on the school's initiatives to improve the ability of students to catch up to and remain on schedule; and
- f. Any additional information the school believes will assist the Commission in determining the school's compliance with accrediting standards.

2. ACAST did not demonstrate that:

- The school has full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*);
- Appropriate administrative and operational policies and procedures to which the school adheres, reviews, and updates as needed (*Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*); and
- The continuity of management and administrative capacity through the reasonable retention of management and administrative staff (*Section I (A)(4) Substantive Standards, Standards of Accreditation*). As of the time of the on-site evaluation, there has been significant turnover on campus and some staff informed the team that they were planning on resigning due to conditions at the school.

The on-site evaluation team noted that the school appeared to be primarily student run with few qualified non-student staff/faculty member employees. In addition, the on-site evaluation team observed a lack of written policies and procedures for school operation, which has contributed to most of the findings noted in the review. Anonymous complaints additionally raised questions regarding the school's administration, noting unclear organizational structures and unprofessional behavior from administrators.

ACAST acknowledged a lack of administrative training and issues caused by a small administrative team in its July 3, 2024 response. In addition, ACAST noted action items to address policies, reporting, and oversight details in a July 2024 All Hands Meeting and in an Occupational handbook (to be finished by August 31, 2024), to fill open positions by 2025, and to put into effect a punitive process for violations of the employee handbook. In response to the June 23, 2024 on-site evaluation report ("OER"), ACAST provided a Management Personnel Retention Chart for all management/administrative level staff at the school for the period of January 1, 2024 to June 30, 2024. As part of the chart, the school listed [REDACTED],⁷ President, and [REDACTED], Vice President, with a tenure of 40 years and 10 years, respectively. However, the response does not include information on the education, experience or demonstrated ability to lead and manage a post-secondary educational institutional in compliance with accrediting standards.

The school's response also indicates that:

Aviator College acknowledges the staffing issues identified by the Commission and its lack of qualified administrators as identified in Section I (A)(1)(a), Substantive Standards, Standards

⁷ More recently, subsequent to the February 2025 meeting the Commission received ACAST's April 30, 2025 notification of a leadership change upon the death of [REDACTED]. Based on this notice, the Commission anticipates that the school's response to this letter will contemplate the change.

of Accreditation. Some staff were hired predicated on having a graduate degree, not because they had the experience necessary to function in a vital role. Some of this was born out of an abandoned position needing to be filled rapidly. Combined with no administrative leadership from the Vice President of Academic Affairs, these roles were never acclimated to the standards, nor were they adequately trained on the compliance standards under their purview.

The individuals who produced work that resulted in many findings have resigned. However, the College had already decided that most would be terminated after the site visit due to their unwillingness to modify their process following compliance standards after the current Director of Academic Affairs provided them with training on compliance standards as they apply to their position (July 23, 2024 ACAST Response, pg. 5).

Although the school “acknowledges the staffing issues” and the decision for termination, the organization chart supplied in the response lists Vice President [REDACTED] as the person overseeing all of the directors and other senior management, who has been with the organization for 10 years and reporting directly to President [REDACTED] who has been with the organization with 40 years. Given that these individuals were in these roles during both fatalities and have not ensured continuous compliance with ACCSC accrediting standards—despite having 50 years of combined experience—the Commission questioned whether the school has completed the necessary analysis and identified the root cause of the issues that led to these incidents and findings.

With regard to the appropriate administrative and operational policies and procedures, ACAST stated that these have “historically been the General Operations Manual (GOM) and the Employee Manual” (*Id.*, pg. 8) and that since the on-site evaluation, the school has provided the Emergency Response Plan to all employees. However, the response does not provide information as to how the school plans to review and update this information as needed. The Commission is interested in reviewing the updates to the employee handbook along with any other pertinent information along with documentation for implementation of appropriate administrative and operational policies and procedures. Therefore, the November 26, 2024 Warning directed ACAST to provide a copy of the updated administrative and operational policies and procedures along with information on how the school reviews and updates policies and procedures as needed.

In response to the November 26, 2024 Warning, ACAST described the collaborative process to develop occupational manuals for each department. The school stated that:

A work in progress, some occupational manuals are still being worked on as we revisit certain areas of the student life cycle to ensure a detailed and transparent process. This clarity and opportunity to design a process that aligns with standards is intended to help each department demonstrate its own individual hallmarks of quality. While all of them are a living document and will be used in all department training and assessment processes, those still in development are indicated with a “DRAFT” statement. The completed and draft handbooks are attached for review (6). The one exception is that the new Chief Pilot has asked for 6 months to review, amend/create the handbooks for all flight operations positions (January 23, 2025 ACAST Response, pg. 8).

Handbooks appear to exist for Academic Affairs, Director of Education, Registrar, Admissions, Financial Aid, Student Services, Human Resources/Career Services, Librarian, President, and Vice President, which appear to contain general information, standards, reporting procedures, and policies. Some manuals also include a section on duties. While the school provided these manuals, it remains unclear whether the school has effectively implemented the policies and procedures outlined, especially considering that the school has not demonstrated compliance in the majority of the areas discussed herein. As the school did not demonstrate that the school adheres to these policies and procedures, the

school failed to demonstrate compliance with *Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*.

Regarding the continuity of management and administrative capacity, the Commission noted that the Director of Academic Affairs, Director of Financial Aid/Veterans Affairs, Registrar, Director of Education, Director of Admissions, Director of Maintenance, and Assistant Director of Maintenance have less than 1 year of tenure with the institution and the Chief Pilot “has agreed to resign effective August 30, 2024 once a replacement to be hired [*sic*]” (July 23, 2024 ACAST Response, pg. 4). In addition, the President, Vice President, Director of Academic Affairs, Director of Financial Aid/Veterans Affairs, and Director of Maintenance appear to be shared resources with the branch campus located 100 miles away leading the Commission to question the adequacy and effectiveness of oversight of both the main campus and the branch campus (see Item #23 below). Further, although ACAST provided a list of training in which school personnel have engaged that started after January 1, 2024, the response does not include any documentation that these trainings were in fact completed. Moreover, while the College “will be working to ensure that new hires all have the right combination of education, experience, and ability to lead and manage a post-secondary educational institution” (*Id.*, pg. 9), and will begin “a series of trainings intended to upskill those already on staff” (*Id.*), these appear to be upcoming plans rather than a demonstration of current adequate management and administrative capacity. Therefore, the November 26, 2024 Warning directed the school to submit additional management and administrative staff information.

In response to the November 26, 2024 Warning, ACAST provided a Management Personnel Retention Chart for the period of July 1, 2024 to November 30, 2024 that lists 17 current staff members. The Commission found that 13 staff members have a tenure of less than 18 months and six of those staff members have a tenure of 6 months or less. As captured below (see Item #8 below), it is unclear whether each of these individuals participate in ongoing development and training activities that support their particular roles in the school. Additionally, ACAST identified a 34.6% employee turnover rate between January 1, 2024 and November 30, 2024. The school acknowledged that this is high and asserted that “15% of the employees who left the organization were directly responsible for many of the Commission's findings and failures to meet substantive standards” (January 23, 2025 ACAST Response, pg. 11). In the five months following the departure of four employees in July/August 2024, ACAST has not made the necessary adjustments to demonstrate compliance with accrediting standards as listed in this Probation. As time continues without the school documenting its compliance with standards, the Commission questions the school’s assessment that its issues were driven by the employees who left the school. For example, as seen below (see Items #7, #8, and #10), ACAST referenced several occasions wherein current school staff did not provide documents for the school’s response to the Commission. The Commission determined that the school has not demonstrated continuity of management and administrative capacity in compliance with *Section I (A)(4) Substantive Standards, Standards of Accreditation*.

As part of the explanation and justification as to how the school has a sufficient number of managers and administrative employees, ACAST stated that the current ratio of 225 students and 17 staff is “one administrator per 13 students, which is sufficient to serve the student body with personalized services, even if that includes a broader range of services within each department than would be found in larger colleges” (*Id.*, pg. 7). However, this ratio does not take into account that student needs are not evenly distributed. For instance, the number of students requiring student services assistance may far exceed the number of students requiring the assistance of the person responsible for International Business Development. The Commission noted that students share these same concerns based on the low level of student satisfaction across departments (see Item #5 below).

Further, the school stated:

in aviation, a ratio of one administrator to every 30 students is standard and deemed sufficient to provide leadership for a flight training department. ACAST meets this criterion (1:22.4) with the Chief Pilot, Assistant Chief, six check airmen, a head dispatcher, and a safety manager managing all aspects of the flight line daily. The other standard ratio in flight training is 1 flight instructor for every six students. ACAST is currently at 1:5.6 (Id.).

However, the Commission disagrees with the school’s assessment—91% of current students are more than 100 days behind on their program (see Item #1 above). Moreover, given the quantity of continued concerns and the breadth of areas, the Commission determined that the school has not demonstrated the ability to lead and manage a post-secondary educational institution in compliance with *Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school to provide the following:

- a. An updated Management Personnel Retention Chart for all management/administrative level staff at the school for the period of July 1, 2024 to March 31, 2025 using the following format:

Name	Title	Initial Date of Employment	Initial Date of Employment for Current Position	Tenure of Service for Current Position		Reason for Leaving/Termination (if applicable)
				Yrs.	Mos.	

- b. An explanation for daily oversight of the President and Vice President given the structure of the organizational chart;
 - c. The school’s current population to include the number of students in non-vocational programs;
 - d. An explanation and justification as to how the school has a sufficient number of managers and administrative employees—taking into account the size of the student population and the complexity of the training operation—necessary to lead and manage this post-secondary educational institution in compliance with accrediting standards;
 - e. An organization chart showing all personnel responsible for the administration of the school;
 - f. Formal job descriptions for all personnel listed on the organization chart;
 - g. An update of the school’s efforts to increase retention for management and administrative staff including any new initiatives developed by the school, the average tenure of managers based on the data submitted in the above chart, and a summary of the impact of the strategies employed to ensure greater retention going forward;
 - h. A description of and evidence of completion for all training in which management and administrative staff engaged during the time period of July 1, 2024 to March 31, 2025 (please highlight any newly hired staff during this period and all of the training these individuals received);
 - i. The school’s turnover rate for management and administrative staff for the time period July 1, 2024 to March 31, 2025;
 - j. A copy of the school’s updated administrative and operational policies and procedures along with documentation of implementation; and
 - k. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
3. ACAST did not demonstrate an acceptable level of student achievement with regard to the rates of student graduation and employment reported student graduation and employment rates that do not meet ACCSC’s minimum benchmarks as outlined below (*Section VII (B)(2)(b), Substantive Standards*,

Appendix VI, Standards of Accreditation). As part of the school’s response to the November 26, 2024 letter, using a January 2025 Report Date, the school reported the following student achievement information:

Program (Credential)	Length in Months	ACAST Graduation Rate	ACCSC Benchmark Graduation Rate	ACAST Employment Rate	ACCSC Benchmark Employment Rate
Aeronautical Science (AS)	24	50%	40%	47%	70%
Commercial Pilot (Certificate)	9	25%	60%	0%	70%

The graduation and employment rates highlighted above fall significantly below ACCSC’s student achievement benchmark rates.⁸

Previously, ACAST explained that the graduation rate for the Commercial Pilot (Certificate) program was impacted by students not completing the program within 150% of the length of the program with a 9-month length. In the most recent response, the school suggests that the delays are related to the two fatalities at the school as well as the administrative changes, including the chief pilot. The new chief pilot is reviewing timelines and the school is reviewing the program before any changes are made. As stated above in (1.), such delays are unacceptable and as seen here, impact the school’s compliance with other accrediting standards.

The school also drew attention to the students who enroll in the Commercial Pilot course, stating that “the Commercial Pilot Program does not enroll any domestic students” (January 23, 2025 ACAST Response, pg. 13). To find employment, the students were previously competitive with the 250 hours required for the Commercial Pilot license. The school stated that in the past five years, the employers expect additional flight hours, so the graduates gain this experience as a flight instructor. As such, 73% of the graduates have been classified as “further education” as they are enrolling in a flight instructor course. The school admits that this process will never allow this program to meet the employment benchmark. However, the Commission questioned whether the enrollment in the flight instructor course is at least half-time enrollment, as is required for the classification of further employment.

In order to eliminate some of these issues, ACAST indicated that the school plans to revive the discontinued Professional Pilot program. However, the school has yet to submit the necessary Request to Show Good Cause in order to apply for a new program while on Warning or Probation.

Given the wide range of issues remaining at ACAST, the Commission continues to have significant concerns with the school’s response related to student delays and added concerns with the refusal of the chief pilot to adhere to the school’s presented block schedule. As such, the Commission determined that the school is out of compliance with *Section VII (B)(2)(b), Substantive Standards, Appendix VI, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school to submit the following:

- An update on the pacing of the program and whether the school has extended the normal duration (length in months) for students to complete the Commercial Pilot (Certificate) program;
- A retention Chart for the 9-month Commercial Pilot (Certificate) program using a February 2025 Report Date;
- A Graduation and Employment Chart for the 24-month Aeronautical Science (AS) program and the 9-month Commercial Pilot (Certificate) program using **January 2025 Report Date**;

⁸ Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.

- d. Summary information for each Graduation and Employment Chart organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:

- i. For each student start, provide the following:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Commercial Pilot	1/10/2022	10/15/2022	N/A
2	12346	Commercial Pilot	1/10/2022	N/A	7/10/2022

- ii. For each student classified as “Unavailable for Graduation” (line #6), provide the following:

Count	Graduate ID	Program	Start Date	Reason Unavailable	Description of the Documentation on File
1					

- iii. Supporting and verifiable documentation for each student in (ii.) above to include minimally, external documentation such as military orders, letter from physician/doctor, death notice/obituary, public record of incarceration;

- iv. For each graduate classified as employed in the field⁹ (line #14), provide the following:

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Contact, Address, & Ph. #	Date of Initial Employ.	Descriptive Job Title and Responsibilities	Source of Verification (i.e., graduate or employer)
1								

- v. Supporting and verifiable documentation or a narrative justification for each graduate in (iv.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study;

- vi. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Count	Graduate ID	Program	Start Date	Graduation Date	Description of the Documentation on File
1					

- vii. Supporting and verifiable written documentation for each graduate in (vi.) above to include a signed statement from the graduate with the graduate’s name and contact information; an attestation that the self-employment is aligned with the individual’s employment goals, is vocational, is based on and related to the education and training received; an attestation that the graduate is earning training-related income; and in cases where licensure is required for employment, an attestation that such licensure has been achieved;

- viii. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

Count	Graduate ID	Program	Start Date	Graduation Date	Description of the Documentation on File
1					

- ix. Supporting and verifiable documentation for each graduate in (viii.) above to include written documentation from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school; and

- x. For each graduate classified as “Graduates-Further Education” (line #11) or “Graduates-Unavailable for Employment” (line #12), provide the following:

Count	Graduate ID	Program	Start Date	Classification on the G&E Chart	Reason	Description of the Documentation on File
1						

⁹ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

- xi. Supporting and verifiable documentation for any graduate classified in (x) to include, minimally, external documentation such as transcripts/enrollment agreements for “Graduates-Further Education” and military orders, letter from physician/doctor, death notice/obituary, public record of incarceration, etc. for “Graduates-Unavailable for Employment”; and
 - e. Any additional information, including contemporaneous retention, graduation, or employment data, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s student achievement outcomes requirements.
4. ACAST did not demonstrate that the school supports student achievement rates through the school’s verifiable records and documentation of initial employment of its graduates (*Section VII (B)(2)(b) & Appendix VII, Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the school was unable to provide documentation for the Third-Party Verification Report. In addition, the initial employment documentation provided to the team did not include required elements outlined in *Appendix VII – Guidelines for Employment Classification*, such as graduate name and contact information, program name, date of graduation, date of initial employment, place of employment, employer/supervisor contact information, descriptive job title and date of verification. As part of the school’s response to the June 23, 2024 OER, ACAST provided an explanation of its current process for verifying graduate initial employment and described its attempts to collect verification from students prior to graduation. The school also explained that the Career Services Manager at the school resigned in June 2024 and that while the school stated it has plans to hire a new staff member to fill the position, the position remains vacant.

As part of the school’s January 23, 2025 response, the school provided employment verification forms which appeared to have been completed by employers, with several graduates having been hired by ACAST. All forms include a signature line and generally external employers appear to have signed the form; however, those completed by ACAST do not include a signature. While the forms appear to have been completed by the Vice President of ACAST, the lack of a signature from an internal employee on an internal document indicates of a lack of consistent internal policy and procedure. As such, the Commission determined that the school is out of compliance with *Section VII (B)(2)(b) & Appendix VII, Substantive Standards, Standards of Accreditation*.

The Commission directs ACAST to submit the following:

- a. The school’s policies and procedures related to initial employment verification;
- b. A description of the school’s graduate assistance to include the current personnel responsible for assisting students with placement including an update as to the hiring of a Career Services Manager;
- c. A copy of the school’s current verification form or other tool the school is currently using to verify employment;
- d. A list of the 10 most recent graduates who gained employment in the career field for which the school provided education using the following chart (sample text):

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Address, Phone #, & Point of Contact	Date of Initial Employ.	Descriptive Job Title
1	1235	Commercial Pilot	1/1/24	10/15/2024	ABC Airline, 123 Sample Way, Anywhere, MD 222.333.1234 John Doe	12/1/24	Pilot
2	1234	Commercial Pilot	1/1/24	11/1/2024	CDE Airline, 456 Maple Dr. Somewhere, VA 333.444.5678 Jane Smith	1/3/25	Pilot

- e. The school must provide the following supplementary information for each graduate identified in the chart above:

- i. A completed verification form for each graduate employed;
 - ii. For each graduate classified as self-employed, a signed statement from the graduate verifying that the employment is valid which includes the following:
 - The graduate's name and contact information;
 - An attestation that the self-employment is aligned with the individual's employment goals, is vocational, and is based on and related to the education and training received;
 - An attestation that the graduate is earning training-related income; and
 - In cases where licensure is required for employment, an attestation that such licensure has been achieved; and
 - iii. For each graduate classified as "career advancement," supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate's ability to be eligible or qualified for advancement due to the training provided by the school; and
 - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with ACCSC's requirements.
5. ACAST did not demonstrate that the school is both attentive to its students' needs as a means to support retention and also maintains written policies and procedures addressing student services, and makes students aware of such services (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). Results from the student survey conducted during the on-site evaluation indicate dissatisfaction with the school in all major areas across both programs. Additionally, the on-site evaluation team noted that the school did not maintain written policies and procedures addressing student services and making students aware of these services. The sentiment of a lack of communication to students was echoed in an anonymous complaint to which the school responded, "[t]his complaint is valid" (July 23, 2024 ACAST Response, pg. 43). As part of the school's response to the June 23, 2024 OER, ACAST provided plans to increase student satisfaction, including the addition of new staff, faculty training, facility improvements, and expanded student services.

In the school's January 23, 2025 response, the school provided updated student satisfaction rates from a recent survey. While the area of Faculty significantly increased to an 83% satisfaction rate, the areas of Admissions (69%), Financial Aid (57%), Equipment (42%), all improved but are still low. The areas of satisfaction with Academic Progress (55%), Student Services (37%), Library/Learning Resource System (63%), and Facility (57%) all remained low with little change. Lastly, only 33% of students felt good about their decision to attend ACAST and only 25% of students would recommend ACAST to a friend. The school acknowledged that all changes needed to increase student satisfaction require time, money, and resources. ACAST indicated that the school intends to continue changes necessary to increase student satisfaction but that it will likely not be a quick process. The school stated that the spring assessment period will include results covering a time period when the new members of the administrative team will have first engaged in institutional assessment, which the school believes will help team members move toward a unified goal. The school believes they will see significant improvement by the fall of 2025.

While the Commission acknowledged that improving student satisfaction requires effort and time, the Commission remains concerned in the efforts of the school to remain attentive to student needs in all areas. Indicating that only now in the spring of 2025 will the school engage in institutional improvement planning does not show that the school has sufficiently engaged in a comprehensive process to

immediately address the Commission's concerns. The Commission determined that the school is out of compliance with *Section VI (A)(1), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs ACAST to submit the following:

- a. Results of a student survey using either the ACCSC student survey or one that is substantially similar that includes the following:
 - i. A description of the student survey process and a copy of the survey instrument used;
 - ii. A detailed analysis of the student survey results with a particular focus on any results that show less than 80% satisfaction; and
 - iii. A detailed narrative of the school's plan to address any areas of student satisfaction, if applicable, and any other information to support the efforts made to enhance a student's experience at the school;
 - b. An assessment of the factors impacting the rates of student dis/satisfaction;
 - c. A description of the school's mechanisms for remaining attentive to student needs;
 - d. An explanation as to how the strategies implemented by the school are intended to target those factors;
 - e. A description of how the school is measuring the effectiveness of those strategies; and
 - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
6. ACAST did not demonstrate that:
- The school's student services program encompasses student safety and well-being (*Section VI (A)(3)(b), Substantive Standards, Standards of Accreditation*) and
 - The school maintains comprehensive documentation of student advising sessions (*Section VI (A)(4), Substantive Standard, Standards of Accreditation*).

At the time of the on-site evaluation, the school did not supply the team with evidence of advising sessions other than entrance/exit financial aid sessions. As part of the school's response to the June 23, 2024 OER, ACAST submitted a description of how to better track advising sessions for students. The school indicated that it planned to create a formal policy and procedure to be included in the student handbook by August 2024. The school also included records for the five most recent advising sessions that occurred since the on-site evaluation.

In the January 23, 2025 response, ACAST provided the Counseling/Advising section of the school's catalog. This section describes that the school does not offer any counseling services other than academic advising, as the previous counselor no longer works at the school. The catalog also states that individual advising sessions are scheduled by appointment and faculty members are also available to meet with students. The catalog description provided does not make it clear who the student should schedule academic advising with. The catalog states that generally students are able to speak with a member of the college's management team for guidance, encouragement, or assistance in career fields. While the school previously stated a formal policy and procedure related to academic advising was expected to be completed by August 2024, the school did not include this policy and procedure in its January 23, 2025 response. Lastly, the Commission requested that the school submit a sample of 10 most recent advising sessions. The school's January 23, 2025 response indicates that the departments affiliated with academic advising did not provide the documentation and therefore it was unable to be provided for the Commission's review. The Commission found this lack of internal collaboration to be highly concerning and indicative of overall management and administrative capacity issues at the

institution. In this instance, the failure to provide this information to the Commission places the school out of compliance with *Section VI (A)(3)(b), Substantive Standards, Standards of Accreditation* and *Section VI (A)(4), Substantive Standard, Standards of Accreditation*. .

With regard to student safety, the Commission previously communicated that ACAST earned a minimally adequate level of trust with regard to the school's safety initiatives following the noted incidents. The school described its intent to move to a culture of student service spanning the entire organization. The school also pointed to the results of its survey which indicate that half of the school's students would not or not likely would not use mental health/physical well-being services, which also means that half would have an interest in such services. To that end the school indicated that the Student Services Coordinator reached out to a local provider for on-campus services and the school is seeking budget approval for the initial \$10,000 cost. The school stated it is continuing to reach out to local providers to identify student discounts, low-cost services, or partnership opportunities and will be looking to the results from a survey in the third week of the semester to gather insights on student needs.

Based on the foregoing, the Commission directs the school to submit the following:

- a. The school's policy and procedures related to student advising;
- b. A sample of the 10 most recent advising sessions since the January 23, 2025 submission;
- c. The results of the referenced survey and a description of any additional services offered as a result of the survey results;
- d. Documentation of any newly offered services as referenced in (c.) above; and
- e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

7. ACAST did not demonstrate that:

- The school has operational policies necessary to adequately support educational programs and faculty (*Section III (A)(1)(a), Substantive Standards, Standards of Accreditation*) and
- The school's chief pilot who acts as oversight with responsibilities typical of a director of education has an earned degree at least one level higher than the highest degree offered by the school (*Section III (A)(1)(b)(ii), Substantive Standards, Standards of Accreditation*).

The June 23, 2024 OER states that although the school has a written faculty handbook "Aviation Instructor's Handbook (FAA-H-8083-9)," it does not appear that the school maintains any policies or procedure manuals related to academics other than the school catalog. The on-site evaluation team noted that the Aviation Instructor's Handbook discusses learning styles, communication, and pedagogy. However, it does not appear to be a manual for the inner workings of the school's academics to include information on grading, grade submission, satisfactory academic progress, or other internal educational policies and procedures. In response to the June 23, 2024 OER, ACAST provided the General Operations Manual and Employee Handbook but also indicated that these documents are currently being updated.

Additionally, the on-site evaluation team noted that the school's Chief Pilot who is responsible for oversight of the program and flight operations does not have at least a Bachelor's degree as required. In response to the June 23, 2024 OER, ACAST stated that the Chief Pilot resigned and that the school hired a new Director of Education. However, while Director of Education appears to have the necessary background to serve in this role, this new Director of Education had only been on the job for two weeks at the time of the response submission. As such, the November 26, 2024 Warning directed the school

to provide additional information on the operational policies and procedures along with clarification on the duties for the Chief Pilot and Director of Education.

In response to the November 26, 2024 Warning, ACAST provided a January 17, 2025 Employee Handbook and a 2023 General Operations Manual. The organizational chart in the updated Employee Handbook lists the General Education Adjunct Faculty as reporting to the Registrar and the Occupational Faculty reporting to the Director of Education who in turn reports to the Chief Pilot. The response also states that [REDACTED] is considering promoting the current registrar to Vice President of Academic Affairs, however, the narrative does not include any details on the reporting structure or how the duties would be split among the Vice President of Academic Affairs, Director of Education, and Chief Pilot. Without this information, and given the range of educational findings described in this Probation (minimally, Items 1, 3, and 12), the Commission determined that the school is out of compliance with *Section III (A)(1)(a), Substantive Standards, Standards of Accreditation*.

In addition, while the November 26, 2024 Warning directed the school to submit Staff Personnel Reports for the education administrators, the January 23, 2025 Response indicates that these “were not provided by the department” (pg. 47). The school’s inability to demonstrate effective interdepartmental communication and resulting failure to submit necessary documentation are deeply concerning to the Commission. Since the school provided no information on the education administrators, the Commission has determined that ACAST is out of compliance with *Section III (A)(1)(b)(ii), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school to provide the following:

- a. A copy of the school’s operational policies and procedures specific to adequately support educational programs and faculty to include any updates since the January 2025 submission;
 - b. An organizational chart for education administration;
 - c. A Staff Personnel Report for each individual included in (b.) above;
 - d. Documentation of any training/professional development completed by the Director of Education, Chief Pilot, and Vice President of Academic Affairs, as applicable;
 - e. An update on the division of duties between the Vice President of Academic Affairs, Director of Education, and Chief Pilot regarding training and professional development; and
 - f. Any additional information that the school believes will assist the Commission in determining the school’s compliance with ACCSC’s requirements.
8. ACAST did not demonstrate that the school staff and faculty participate in professional development activities by clearly showing the following:
- Members of school management and administrative employees participate in ongoing development and training activities that support their particular roles in the school (*Section I (A)(3) Substantive Standards, Standards of Accreditation*);
 - The school’s faculty and educational administrators engage in ongoing faculty assessment and professional development activities that are: appropriate to the size and scope of the school’s educational programs; support the quality of education provided; and enhance student learning and achievement and the school did not document the implementation of assessment and professional development activities for its faculty (*Section III (A)(2), Substantive Standards, Standards of Accreditation*); and
 - The school’s faculty engage in ongoing development of teaching skills as part of its plan for faculty improvement (*Section III (B)(4), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team noted that the school could not provide documentation that management and administrative employees are engaged in professional development or training activities. Additionally, the on-site evaluation team found that there is no professional development in place for faculty and that while there are courses at the beginning of the program that are intended to teach students to teach other students, once those are complete there appears to be no further support.

In response to the June 23, 2024 OER, ACAST provided a copy of the Employee Handbook which includes an annual requirement for all employees to be engaged in professional development to include evaluation, professional development plans, and continuing education requirements. In addition, the school noted the FAA Instructor Handbook requires faculty to continue to develop their knowledge and skills. Further, the response indicates that departmental training will begin in August. Additionally, to maintain compliance on an ongoing basis, the school indicated that the Director of Education and Registrar will provide quarterly reminders to all faculty members. While the school outlined the internal requirements, external requirements, and plan for professional development and ongoing compliance, the response to the June 23, 2024 OER failed to provide any documentation of the implementation of these policies or practices. Therefore, the November 26, 2024 Warning directed ACAST to provide updated information on management, staff, and faculty ongoing development and training activities.

In response to the November 26, 2024 Warning, ACAST provided an organizational chart, Employee Handbook, and documentation of internal training including online ACCSC training. Although the school provided documentation of these training activities, ACAST did not show that the ongoing development and training activities support each staff member's particular roles in the school. This is particularly important given that 13 staff members have a tenure of less than 18 months with six staff members with a tenure of six months or less (see Item #2 above). Further the lack Staff Personnel Reports due to a deficiency of interdepartmental communication as identified above (see Item #7 above), do not allow for a fulsome review of the school. As such, the school is out of compliance with *Section I (A)(3) Substantive Standards, Standards of Accreditation*.

Furthermore, while the response includes a list of current faculty members, the response does not include Faculty Personnel Reports with the statement "[t]he faculty personnel reports were not provided by the department" (January 23, 2025 ACAST Response, pg. 48). Additionally, ACAST stated "[o]ther faculty members and flight instructors have either not completed any professional development or their efforts have not been documented to provide to the Commission" (*Id.*). As noted previously, the demonstrated inability for interdepartmental communication and the lack of necessary documentation are deeply concerning to the Commission. Since the school provided no evidence of ongoing faculty assessment and development, the Commission has determined that ACAST is out of compliance with *Section III (A)(2), Substantive Standards, Standards of Accreditation* and *Section III (B)(4), Substantive Standards, Standards of Accreditation*.

Based on the foregoing findings related to staff and faculty professional development, the Commission directs the school providing the following:

- a. A copy of any updated policies and procedures for school management and administrative staff ongoing training and development;
- b. An updated organization chart listing the school management and administrative staff along with name and job titles;
- c. Documentation for each individual identified as school management and administrative staff on the organization chart demonstrating adherence to the school's policies and procedures for ongoing training and development since the January 2025 submission to include information specific to their particular roles in the school;

- d. The school’s internal policies and procedures for ongoing faculty assessment and professional development activities;
 - e. A list of current faculty members along with a Faculty Personnel Report for each;
 - f. Supporting documentation of implementation of assessment and professional development activities for each current faculty member—per the school’s policies and procedures;
 - g. Documentation of the quarterly reminders to demonstrate the school’s plan to ensure compliance on an ongoing basis; and
 - h. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
9. ACAST did not demonstrate that the school ensures the continuity of instruction through the reasonable retention of the educational administrative staff and faculty (*Section III (A)(3), Substantive Standards, Standards of Accreditation*). The evaluation team found that nearly all faculty members are current students who have earned a flight instructor rating from the FAA but are still working towards their commercial flight hours. The faculty tenure rate is less than 1 year, and this turnover appears to be due to the faculty hiring model where the school only hires current students to teach and the instructor rating is required as part of the associates degree. The majority of flight instructors do not appear to have an interest in teaching but take on this role simply to fulfill their obligation to their program, combined with income and the collection of flight hours towards their commercial qualifications. Interviews with the instructors completed during the evaluation indicated that faculty did not like teaching, felt unprepared, and would rather focus on their own career goals. As part of the school’s response to the June 23, 2024 OER, ACAST provided a plan to increase the average tenure of faculty by hiring full-time dedicated faculty for the aviation related courses so that there is more long-term engagement.

As part of the school’s response to the November 26, 2024 Warning, the school provided a list of faculty for the period of July 1, 2024 to December 31, 2024. The list features 17 educational staff and faculty with 7 of the 17 having left the position for various reasons and two hired adjunct faculty members since the last response, equating to a turnover rate of just over 40% in 2024. The school acknowledged the concerns related to the retention of educational faculty and staff. With regard to training for the new faculty, ACAST stated that “[n]o CE training evidence for the Chief Pilot, Assistant Chief Pilot, or new instructors can be provided now” (January 23, 2025 ACAST Response, pg. 51). Additionally, the school indicated that the Director of Education is working on a training and onboarding process and the school stated that once this is completed, the faculty handbook will be distributed.

Upon review of the school’s response in this area, the school did not clearly show that it has made progress toward its original goal of hiring dedicated full-time faculty—all new-hired faculty are adjunct, and the response does not address this plan/goal. Moreover, the 40% turnover rate for 2024 does not demonstrate that the institution ensures continuity of instruction. The Commission determined that the school is out of compliance with *Section III (A)(3), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs ACAST to submit the following:

- a. A Faculty Retention Chart for all educational administrative staff and faculty at the school for the period of January 1, 2025 to March 31, 2025 using the following format:

Name	Title	Initial Date of Employ.	Initial Date of Employment for Current Position	Tenure of Service for Current Position		Current or Former Student		Reason for Leaving/Termination (if applicable)
				Yrs.	Mos.	Yes	No	

- b. A detailed description of the school's efforts to increase retention of the educational administrative staff and faculty including any new initiatives developed by the school, the average tenure of instructors and educational administrative staff based on the data submitted in the above chart, and a summary of the impact of the strategies employed to ensure greater retention going forward;
- c. Evidence of any training for any new faculty and educational administrative staff hired since the on-site evaluation;
- d. The school's turnover rate for educational administrative staff and faculty for the time period March 31, 2025 to March 31, 2025;
- e. A detailed description of the oversight of the educational administrative staff and faculty; and
- f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

10. ACAST did not demonstrate that:

- The school verifies prior work experience and maintains documentation of academic credentials of all faculty members and administrators (*Section III (A)(4), Substantive Standards, Standards of Accreditation*) and
- Faculty members have appropriate qualifications and be able to teach in a manner that permits announced educational objectives to be achieved and that all faculty are able to demonstrate a command of theory and practice, contemporary knowledge, and continuing study in their field (*Section III (B)(3), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team noted that instructors appear to have no experience or qualifications as each instructor is a current student. These current students appear to hold private and instructor ratings. However, because faculty are all current students, there is little to no professional experience for each that is verified by the school as required.

In response to the June 23, 2024 OER, the school confirmed that many of the faculty members are graduates from the school. In lieu of providing a verification process for the faculty members' qualifications, the school noted that they are considered qualified by virtue of completing the training program. The Commission may allow a flight school to hire certified individuals who do not possess the minimum of three years of practical work experience in the field as instructors when certain conditions are met. In order to accommodate this unique aspect of the industry and yet ensure flight schools retain a strong and experienced faculty, the school must address the following institutional policies, processes and procedures:

- The flight school must demonstrate that it has appropriately rigorous hiring criteria;
- The flight school must demonstrate that it appropriately supervises faculty;
- The flight school must demonstrate that faculty engage in comprehensive faculty development and improvement activities; and
- The flight school must demonstrate the use of a formative and summative performance evaluation process for faculty.

In response to the November 26, 2024 Warning, ACAST provided an employee handbook and indicated its plans to draft a faculty handbook; however, this has not yet been completed. In order to demonstrate that the school has the required rigorous hiring criteria, the school provided the evaluation process for hiring. First, a candidate must have completed instructor training and passed and received the instructor license. They must then interview with the Chief Pilot or Assistant Chief Pilot about aviation knowledge, level of spoken English, ability to teach and "knowledge syllabus" [*sic*]. Lastly, the Chief

Pilot or the Assistant Chief Pilot also assess practical flight ability including airborne ability, teaching standard, and pilot skill.

In order to verify employment, the school uses a third-party service, ActiveScreening. If employment cannot be verified, ACAST then utilizes a second third-party service such as WorkNumber. If that does not produce a verification, the school states Human Resources will meet with the Hiring Manager and the Vice President. However, ACAST does not identify how the school then verifies the employment of those individuals. The school states they also require official transcripts through this policy as well, although the response includes no information related to how the school obtains official transcripts or credentials.

The November 26, 2024 Warning directed the school to submit evidence that faculty are certified or licensed where required by law. ACAST responded that the school's Human Resources department did not provide the faculty's FAA licenses for the response. Again, the demonstrated inability for inter-departmental communication and the lack of necessary documentation are deeply concerning to the Commission. Since the school provided no evidence to verify prior work for faculty members, the Commission has determined that ACAST is out of compliance with *Section III (A)(4), Substantive Standards, Standards of Accreditation* and *Section III (B)(3), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs ACAST to provide the following:

- a. The school's policy for verifying faculty prior work experience;
- b. A description of the employment verification process for all faculty members and administrators;
- c. A list of all current faculty members;
- d. Documentation of qualifications and training for those above including completed Faculty Personnel Reports, available at www.accsc.org, to include evidence that faculty members are certified or licensed where required by law and required credentials;
- e. The school's new Faculty Handbook including:
 - i. Written policies and procedures for ensuring that faculty members have appropriate qualifications and are able to teach in a manner that permits announced educational objectives to be achieved;
 - ii. Written policies and procedures for ensuring that faculty members are able to demonstrate a command of theory and practice, contemporary knowledge, and continuing study in their field;
 - iii. Written policies to ensure that faculty engage in comprehensive faculty development and improvement activities; and
 - iv. A description of the school's use of a formative and summative performance evaluation process for faculty;
- f. Evidence of performance evaluations for current faculty;
- g. Evidence of Faculty Development and Improvement activities for current faculty; and
- h. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

11. ACAST did not demonstrate that:

- Faculty teaching technical and occupationally related courses in an academic associate degree program have a minimum of four years of related practical work experience in the subject area(s)

taught and possess a related degree at least at the same level of the course the faculty member is teaching (*Section III (B)(7) Substantive Standards, Standards of Accreditation*);

- Faculty teaching technical and occupationally related courses in non-degree degree programs have a minimum of three years of related practical work experience in the subject area(s) taught (*Section III (B)(5), Substantive Standards, Standards of Accreditation*); and
- Faculty members have received training in instructional methods and teaching skills or are experienced teachers and that should a school hire a faculty member without prior training or experience, the school provides training before the faculty member assumes primary instructional responsibilities in any classroom, curriculum, laboratory, or program related training (*Section III (B)(4), Substantive Standards, Standards of Accreditation*).

At the time of the On-site Evaluation, ACAST did not provide verification of practical work experience for any faculty members and the school did not demonstrate that all faculty have the necessary years of related practical work experience or that faculty members have received training before assuming primary instructional responsibilities. As part of the response to the June 23, 2024 OER, ACAST provided plans to require new faculty to audit courses and demonstrate knowledge of the material through an assessment before they are allowed to teach a course. For aviation courses, ACAST indicated that this will be conducted by the Chief Pilot and for the general education courses it will be conducted by the Registrar. In addition, the Director of Education will conduct evaluations of the aviation faculty and the same will be done by the Registrar for general education faculty.

As part of the school's January 23, 2025 Warning response, ACAST provided a Faculty Onboarding Plan. However, as the school has not yet hired any additional faculty ACAST was not able to provide documentation of implementation for the new orientation. The school pointed to the difficulties in hiring faculty members who meet the requirements set forth in the *Standards of Accreditation*. However, as noted in the previous item, there are allowances for faculty to work as instructors without three years of experience when certain conditions have been met. When directed to provide documentation that the current faculty had previous teaching experience or participated in an instructor on-boarding program the school stated that its previously hired faculty did not have demonstrated teaching experience beyond their resumes, but did not provide the resumes. As the school has not yet provided evidence that conditions have been met for the current faculty's technical experience or teaching skills the Commission found the school out of compliance with *Section III (B)(7) Substantive Standards, Standards of Accreditation*, *Section III (B)(5), Substantive Standards, Standards of Accreditation*, and *Section III (B)(4), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs ACAST to submit the following:

- a. The school's written policies and procedures for the onboarding/ teaching training of new faculty;
- b. Any updates on new faculty members hired since the submission of the previous response;
- c. Documentation demonstrating that each current faculty member either demonstrated previous teaching experience or participated in the school's instructor on-boarding program; and
- d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

12. ACAST did not demonstrate that:

- The school has a developed and structured process to assess and evaluate the defined student learning outcomes of the education and training and established competencies (e.g., the application of knowledge and skills to the standard of performance articulated in the program objectives and as expected in the workplace) and that this process includes a variety and combination of methods

such as grading, portfolio assessment, and criterion referenced testing based on developed and appropriate rubrics (*Section VII (A)(2)(a), Substantive Standards, Standards of Accreditation*). The on-site evaluation team observed that there are no rubrics or criterion of student learning outcomes for the grading of flight time. As such, it is unclear how the school consistently assesses and evaluates student learning outcomes for student flight time.

- The school's student assessment approaches are documented for each course or program offered and are designed and implemented in a valid, reliable, fair and, where relevant, flexible manner (*Section VII (A)(2)(b), Substantive Standards, Standards of Accreditation*). Specifically, the on-site evaluation team noted that active students are responsible for educating other active students. As such, it is unclear how the school's assessment approaches are valid, reliable, fair, and relevant. In addition, comments from the student surveys discuss favoritism for select students whose needs appear to be prioritized.
- Student learning outcomes for each program are consistent with the program objectives defined by the institution's program design and development process (*Section VII (A)(1)(a), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that syllabi are provided by the FAA and aviation instructional materials which are adjusted to meet the schedule of the institution. However, because of the lack of appropriate flying resources, these syllabi do not appropriately or accurately showcase the learning schedule for the courses. Specifically, while the syllabi indicate scheduled flight simulator time and actual flying time, the schedule for these items is not respected nor adhered to.
- The school establishes a policy and process to assess student academic progress throughout the program and to inform students of their academic progress at established and specific intervals. At each interval specified, the school determines the likelihood that the student will be able to attain the minimum cumulative grade point average required for graduation and in those instances when the school determines that a student has not met minimum cumulative grade point average requirements, the school places the student on academic probation or terminates the student, based on the school's established policies (*Section VII (A)(3)(a)(i-ii), Substantive Standards, Standards of Accreditation*). The school's January 23, 2025 response indicates that the school has not been conducting student academic progress reviews for all students.

In response to the June 23, 2024 OER, ACAST stated that the school was working on a plan to ensure the standardization of grading processes. Additionally, the school described that the flight training assessment and evaluation is based on the FAA Airman Certification Standards ("ACS") and instructors are required to take a standardization class that explains how students are assessed. Further, ACAST stated that the school was considering other grading options and noted that an instructor with a student who needed three attempts to pass a "check ride" would result in remedial training. Conversely, the school's response did not provide any further information on the other considerations, the number of instructors who were required to undergo remedial training, or documentation of the remedial training.

In addition, ACAST asserted that all instructors uphold the same standards and that "deviations from those standards would appear at the point of a stage check or end-of-course when a Check Airman, who has additional training and evaluation, identifies an area of deficiency that has previously earned a 'Sat' outcome" (July 23, 2024 ACAST Response, pg. 61). However, the response does not include information on the number of Check Airman currently on staff or what additional training and evaluation is completed. Additionally, while the school included sample rubrics for the flight training end-of-course assessment conducted by the Check Airman, none of these indicate a student signature or password and few include an instructor signature or password.

With regard to the student survey concerning perceived favoritism, ACAST asserted that there may be instances of priority status for VA students. The Commission questioned why current priority status is

given to VA students when all students have a limited amount of time to complete ratings within the maximum timeframe. Additionally, the Commission was interested in information on decisions regarding the use of student workers and the qualifications of the replacement adult staff members. Lastly, while the response includes the school's satisfactory academic progress policies, the response also references a late refund due to the school not conducting satisfactory academic progress calculations. In addition, although the school has hired a new registrar, the response failed to include documentation that the school is currently conducting consistent satisfactory academic progress reviews. As such, the November 26, 2024 Warning directed the school to submit information about student learning outcomes, assessing student work, application of grading, evidence of utilization of metrics or assessments, and satisfactory academic progress.

In response to the November 26, 2024 Warning, ACAST stated that:

The new Chief Pilot is still using the FAA approved Training Course Outlines and the Airmen Certification Standards. No flight training syllabus, beyond these items, has been created to further detail the learning schedule and standard for the courses. The requirement of a syllabus has been presented to the Chief Pilot and will be a team process using the template created by the Registrar and with the participation of the Director of Education to ensure consistent standards (January 23, 2025 ACAST Response, pgs. 58-59).

Additionally, with regard to the school's policies and procedures for clearly explaining educational objectives to students and assessing student work, ACAST stated that the FAA sets the standards and that "all students have access to the ACS, the expectation is that all students understand what to expect from in this process" (*Id.*, pg. 59). However, this response does not address the issue of whether the school clearly explains these expectations to students and ensures consistent grading standards. Further, ACAST stated that:

*The flight training stage checks and end-of-course checks have been assessed by the new Chief Pilot for consistency in standards and grading. There were identified variations in the administration of these assessments and the Chief Pilot established clear parameters for testing with the check airmen. As the departmental manuals are not yet drafted, these policies are not yet published but all of them are adhering and those the demonstrate gross inequities were let go (*Id.*, pg. 59).*

This response does not include documentation of the Chief Pilot's establishment of parameters with the six (6) check airmen on staff.

While the school's July 23, 2024 Response indicates that the Check Airman have additional training and evaluation and serve in a quality assurance role, the January 23, 2025 Response contradicts that assertion, stating:

*The remaining student employees are a few check airmen or they work at the front desk and support the Head Dispatcher. Their [sic] qualifications of the check airmen are that they have student employees [sic] are assessed on how they perform in their program of study and as these are entry level positions there [sic] are not required to have extensive experience (*Id.*, pg. 61).*

The school cannot assert that the check airmen are adhering to department manuals that have not yet been drafted or policies that have not yet been published. While the school's response notes that grading is on "a pass/fail system based on whether the applicant demonstrates the required knowledge, risk management skills, and flight proficiency" (*Id.*, pg. 59), the Commission's concern lies in the fact that an instructor is solely responsible for determining whether each student "can perform the required maneuvers and demonstrate adequate knowledge" (*Id.*), however, ACAST does not have established policies and procedures to ensure consistency across all instructors and students. This is also

problematic given the Commission's other concerns with faculty articulated herein. As such, the Commission determined that the school is not in compliance with *Section VII (A)(2)(a), Substantive Standards, Standards of Accreditation*, *Section VII (A)(2)(b), Substantive Standards, Standards of Accreditation*, and *Section VII (A)(1)(a), Substantive Standards, Standards of Accreditation*.

With regard to priority statuses to include VA students, ACAST stated:

Due to the loss of Veterans' Administration Benefits, the VA students had one final semester to complete their current enrollment rating. ACAST provided them with "priority" scheduling once all instructors bid sheets were submitted (Id., pg. 60).

The Commission was unaware that the school lost Veterans' Administration Benefits and questions whether ACAST should have notified ACCSC of this material event given that it affected the school's operations, policies, staff, curricula, reputation, approval status or authority to operate as a legal entity, or financial status (*Section V (E)(1), Rules of Process and Procedure, Standards of Accreditation*). This is of particular concern given that the school's updated January 17, 2025 Employee Handbook includes a section titled "Material Incident Notification Reports" (*Id.*, pg. 134) that lists the items from the *Standards of Accreditation*. The Commission is interested in obtaining additional information regarding the school's loss of Veterans' Administration Benefits.

In addition, ACAST stated that:

There have been students who have expressed concerns over why other students were flying more hours than they were, and upon review by the new chief pilot, the evidence pointed to a lack of instructor availability or willingness to fly, not an issue due to any "priority" status.

This issue results from either one instructor having too many students or simply not wanting to fly enough hours in a week to keep all of their students busy. The new chief has instituted an accountability measure that will require each student to fly a minimum of five hours weekly, and if any of them do not, the instructor will be held accountable, outside of student "no-shows", and if the instructor continues to have this issue, the check airmen overseeing them will be held responsible. This practice is intended to ensure all students are flying equally, and presenting the best chance for all of them to consistently progress (Id., pgs. 60-61).

The Commission has significant concerns regarding the recent implementation of a minimum number of weekly hours and the accountability of instructors and check airmen. Specifically, because students sign an enrollment agreement or contract with the school to complete a program within a set timeframe, the expected program's length should be based on a thorough assessment of the required weekly and monthly flight hours available to students. Additionally, the school should regularly assess the instructor-to-student ratio to ensure that students can complete the program within that specified timeframe. It is the school's responsibility to ensure that all required courses are available to enable students to complete their programs of study (*Section I (C)(1), Rules of Process and Procedure, Standards of Accreditation*). If instructors are not flying the required number of hours and are held "responsible" per the school's response, then the Commission is interested in documentation of such accountability.

With regard to satisfactory academic progress, ACAST provided a copy of the catalog's description for students on satisfactory academic progress but did not include the school's internal policies and procedures. Further, ACAST stated that:

The Registrar has not been conducting SAP reviews. Most students are behind, and it's been difficult to assess applicable warning or probation statuses. Most are satisfying the GPA requirements under SAP, demonstrating that their lack of progress is not entirely due to their lack of effort.

This process will also be addressed between the Registrar and the Financial Aid Director as a task that may be housed in the Financial Aid office for all students. The goal is to provide consistent calculations and documentation and support the Registrar's SAP processing efforts. Once that is decided, the identified procedure will be included in the Occupational Handbooks (Id., pg. 63).

In reviewing the forms provided “for all federally funded students,” the Commission noted the following:

- There are 19 forms for 13 students with 13 referencing 2024 terms, 4 referencing 2023 terms, and 2 referencing 2022 terms.
- There are 6 “In Progress Semester” forms, each stating that “[t]his statement is to inform students that academic progress could not be completed due to an in-progress course.” Five forms reference Summer 2023 or Summer 2024 terms and indicate that students have until December of the respective year (2023 or 2024) to complete the course. Additionally, there is one form referencing a Spring 2024 semester, with the student required to complete the course by August 2024.
- There are 4 forms dated September 10, 2025.

The Commission reminds ACAST that student satisfactory progress standards are not intended to only apply to students who receive federal funding. Based on the foregoing, the Commission determined that the school is out of compliance with *Section VII (A)(3)(a)(i-ii), Substantive Standards, Standards of Accreditation*.

Therefore, the Commission directs the school to provide the following:

- a. Any updates on the school’s policies and procedures specific to the assessment and evaluation of defined student learning outcomes for students completing flight time;
- b. Any updates on the school’s policies and procedures for assessing student work to include educational objectives that the school explains clearly to students;
- c. An update on the school’s policies and procedures for when a student needs three attempts to pass a check ride and instructor remedial training;
- d. Documentation for any instructor who received remedial training due to student check ride pass attempts;
- e. Any updates for how the school’s policy includes student performance standards and instructor grading and how this policy is applied consistently;
- f. A description regarding Check Airman to include:
 - i. Qualifications to serve as a Check Airman;
 - ii. The job description for a Check Airman;
 - iii. The number of Check Airman on staff at the school and the ratio of Check Airman to students; and
 - iv. Given the role of the Check Airman, how the school’s current ratio of Check Airman to students is appropriate;
- g. Documentation of faculty accountability to minimum flight hour requirements;
- h. Evidence of the utilization of metrics or assessments for multiple students completing the same projects, portfolios, externships, or other assessments;

- i. An explanation of the school's status with the Veterans' Administration to include:
 - i. When the school lost Veterans' Administration Benefits;
 - ii. The number of active veteran students when the school lost access to benefits; and
 - iii. An update on the current status with the Veterans' Administration;
- j. A copy of the school's policy and procedures specific to satisfactory academic progress as listed in the catalog and as part of the school's internal processes;
- k. An update on the application of the school's satisfactory academic progress to include documentation demonstrating that the school has followed its satisfactory academic progress; and
- l. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

13. ACAST did not demonstrate that:

- The school's recruitment efforts focus on attracting students who are qualified and likely to complete and benefit from the education and training provided by the school and not simply obtaining enrollments (*Section IV (A)(1), Substantive Standards, Standards of Accreditation*) and
- The school has admissions criteria that are designed to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered (*Section V (A)(1), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team found that based on the school's on-going below benchmark student achievement rates, it does not appear that the school is attracting qualified candidates. In response to the June 23, 2024 OER, ACAST spoke about the school's open-enrollment admissions policy in an effort to remove subjective barriers to flight training and providing access to flight training for all interested future aviators. While an open-enrollment admissions policy is by no means inappropriate, the Commission is concerned that not attempting to determine the aptitude necessary for pilots prior to enrollment—when considered in the context of the school's poor student achievement outcomes and recent safety concerns—may not serve to identify only those students who are reasonably capable of successfully completing and benefiting from the training offered and could lead to further incidents.

Additionally, the response to the June 23, 2024 OER states that:

The current status of below benchmark graduation rates stem from the lack of control that the College has over the student's training program and progress. This will be corrected with the adoption of a block scheduling system which will allow for a more rigid process for flight training and mandate the application of remedial training for students and instructors, for any that are falling behind their max timeframe towards completion.

Since the on-site evaluation, there has been a more thorough assessment of the College's policies surrounding course delivery and areas where the College loses track of students. This initiated the adoption of a block schedule to be enforced in the Fall 2024 term (July 23, 2024 ACAST Response, pg. 68).

Although it appears that the school is creating the framework to assist students who are currently in the program with remedial training and block scheduling, this framework appears to serve as assistance after enrollment rather than an analysis of the recruitment efforts and admissions criteria.

While the school's July 23, 2024 OER response appears to express views on the school's admissions process and scheduling, the response does not describe how the school's recruitment efforts focus on attracting students who are qualified and likely to complete and benefit from the education and training

provided by the school and not simply obtaining enrollments. In addition, while the response states that “the Director of Education has extensive experience with enrollment management” and that “admissions will be the immediate focus of process vetting and staff training in August” (*Id.*, pg. 69), the school did not provide further information on the process vetting or training.

The Commission was not convinced that below benchmark graduation rates are solely attributable to scheduling issues and expressed concern in the November 26, 2024 Warning that the school has not assessed the extent to which the school may be enrolling students who are not likely to succeed. As such, the November 26, 2024 Warning directed the school to submit information on how the school’s recruitment and admissions practices focus on attracting students who are qualified and likely to complete and benefit from the education and training provided by the school and not simply obtaining enrollments along with an update on the implementation of block scheduling.

With regard to block scheduling, the school’s January 23, 2025 Response simply states “[t]he chief pilot has declined to adopt a block scheduling approach” (January 23, 2025 ACAST Response, pg. 71) without further explanation for how “the current schedule bid process” and extending the bid time that “allows for better preparation, planning, and tracking of student flight time” (*Id.*, pg. 2) includes the mandate for application of remedial training for students and instructors.

In response to the November 26, 2024 Warning, ACAST further asserted that:

The Commission indicated that “it does not appear that the school is attracting qualified candidates,” and while there may be some validity to that, the new chief and assistant chief have found that the below benchmark pace and completion rates stem from a lack of leadership and accountability within the College, and are working to correct that issue (Id., pg. 69).

Additionally, the school stated that the below benchmark graduation rates “are not necessarily a direct result of ACAST enrolling students who are not qualified or won’t benefit” but rather that “a result of a lack of oversight on the [*sic*] student progress” (*Id.*). Specifically, ACAST identified several impacts as a result of this lack of oversight (stage check and end-of-course delays; concerns over English testing; and assessing the need for soft skill aptitude) as causing in most students to exceed their maximum timeframe. While the January 23, 2025 Response provides this analysis and states that an “admissions criteria assessment is underway” (*Id.*, pg. 71), the response does not sufficiently assess the extent to which the school may be enrolling students who are not likely to succeed. The Commission determined that the school is out of compliance with *Section IV (A)(1), Substantive Standards, Standards of Accreditation* and *Section V (A)(1), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school to submit the following:

- a. An updated description of the school’s recruitment efforts;
- b. The school’s current admissions criteria as stated in the school’s catalog;
- c. The school’s internal policies and procedures for the admission personnel;
- d. A justification as to how the school’s recruitment and admissions practices focus on attracting students who are qualified and likely to complete and benefit from the education and training provided by the school and not simply obtaining enrollments;
- e. An update on the analysis of the adequacy of school’s admissions criteria given the school’s below benchmark student graduation rate;
- f. A description of any changes the school has made in the areas of recruitment and admissions since the submission of the January 23, 2025 response;

- g. Documentation demonstrating internal and external assessment of the school's admissions criteria; and
- h. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

14. ACAST did not demonstrate that:

- The school's personnel are trained and qualified to engage in recruiting activities (*Section IV (A)(5), Substantive Standards, Standards of Accreditation*);
- The school has in place policies and procedures and takes reasonable steps to ensure that its personnel do not make false, exaggerated, or misleading statements about the school, its personnel, its training, its services, or its accredited status and to ensure that its personnel do not make explicit or implicit promises of employment or salary prospects to prospective students (*Section IV (A)(8), Substantive Standards, Standards of Accreditation*);
- The school internally reviews and evaluates its recruiting policies and procedures and the performance of personnel involved in recruiting activities for compliance with accrediting standards and applicable law and regulation at least once annually and maintains documentation of the review and evaluation (*Section IV (A)(9), Substantive Standards, Standards of Accreditation*).

During the on-site evaluation, the school did not provide documentation of training for recruitment/admissions staff or appear to maintain any policies or procedures specific to admissions personnel. The school did not have measures in place to ensure that it reviews and evaluates policies and procedures and the performance of recruiting personnel as there was no documentation of any reviews/evaluations. Additionally, the on-site evaluation team noted that the school employs a current student as an admissions recruiter/representative who facilitated the on-site evaluation team's tour at the time of the visit.

The school's response to the June 23, 2024 OER states that "the students serving in the admissions department were let go to comply with [accrediting standards]" (July 23, 2024 ACAST Response, pg. 70) and that due to medical issues "coupled with coupled with a large Spanish-speaking prospective student populous, the College turned to Spanish-speaking students to offset the absence of any full-time staff in the admissions department" (*Id.*, pg. 69). The response indicates that [REDACTED], the Director of Admissions, was hired on January 3, 2024 and [REDACTED] the Director of Financial Aid, started on February 19, 2024. However, the documentation provided does not indicate whether these individuals have the necessary skills to serve a large Spanish-speaking population.

Additionally, while the response to the June 23, 2024 OER indicates that the school's policies and procedures are "tied to the State of Florida Commission on independent Education's Agent Training Standards" the response also indicates that "a final guideline for all recruiting policies will be developed" (*Id.*, pg. 70). Furthermore, the response only identifies three people within the admissions department with signed codes of conduct, [REDACTED], and [REDACTED], who serves as the registrar, without clearly identifying how these individuals complete the recruitment aspect of attracting qualified prospective students.

With regard to internally reviewing and evaluating the school's recruiting policies and procedures, the response indicates that while there is an annual review requirement, the internal review mechanisms have not been consistently used and therefore, there are not "any standard admissions metrics to be used in the evaluation process" (*Id.*, pg. 73). In addition, although the admissions team was trained in February, the team "is still ironing out some system usage with inquiries, prospects, and applicants, so the goal is that there will be solid metrics to conduct a more thorough evaluation" (*Id.*). Additionally, the Director of Academic Affairs will conduct one-on-one training to create metric reporting that will

be used as part of the annual review to occur in January 2025. As such, the November 26, 2024 Warning directed the school to submit information including policies and procedures for recruitment.

In response to the November 26, 2024 Warning, ACAST stated that the school does not have policies and procedures or internally review because:

ACAST has a long history of enrollment by referral, and to that end, the College has not engaged in recruitment efforts since 2018. The currently identified admissions team does not engage in any efforts to recruit students. The College does not purchase any leads or run any active advertising, online or otherwise. The only event attended in 2024 was Sun N Fun, by the Director of Business Development and Corporate Marketing, intending to develop new industry partnerships for student and alumni employment, while giving students discounted tickets. That individual is no longer with the college.

All potential student leads come into the College from passive sources, like referrals or scholarship applications, and no other lead generation is used. Therefore, no one within the College conducts recruitment efforts.

This does not preclude the Director of Admissions, Financial Aid department, and Registrar from signing a code of conduct related to the conversations surrounding potential student inquiries and admissions processing (January 23, 2025 ACAST Response, pg. 72).

However, recruitment is not merely the act of lead generation but rather the process by which the school describes itself fully and accurately to prospective students and permits prospective students to make well-informed and considered enrollment decisions without undue pressure (*Section IV – Statement of Purpose, Substantive Standards, Standards of Accreditation*). As ACAST does engage in recruitment efforts, the lack of policies and procedures in this area is out of compliance with *Section IV (A)(8), Substantive Standards, Standards of Accreditation* and *Section IV (A)(9), Substantive Standards, Standards of Accreditation*.

With regard to internally reviewing and evaluating the performance of personnel involved in recruiting activities, ACAST stated “[n]o internal review or evaluations have been conducted on those working in admissions” (*Id.*, pg. 73). In addition, although the response indicates the inclusion of documentation for one-on-one training for the recruitment and admissions staff, the response lacks an exhibit number or actual documentation. As ACAST does not internally review or evaluate admissions personnel, the school is out of compliance with *Section IV (A)(5), Substantive Standards, Standards of Accreditation* and *Section IV (A)(9), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school to submit the following:

- a. An updated explanation of any action taken since the on-site evaluation;
- b. A description of the school’s policy and procedure related to the training and qualifications of recruiting personnel, those individuals responsible for attracting qualified prospective students to include an update on the school’s final guidance previously in development;
- c. A list of all personnel who engage in recruitment and admissions functions;
- d. An explanation for how these personnel are qualified to assist the prospective student population;
- e. The school’s policies and procedures specific to admissions, the process of enrolling students at the institution;
- f. An update on the school’s policy and procedure for the review and evaluation of recruiting policies, procedures, and the performance of recruiting personnel;

- g. An explanation as to how the school internally reviews and evaluates its recruiting policies and procedures and the performance of personnel involved in recruiting activities for compliance with accrediting standards and applicable law and regulation at least once annually;
- h. Documentation demonstrating any internal review and evaluation to include the annual review and evaluation for each person involved in recruiting activities;
- i. Documentation of any one-on-one training completed by the recruitment and admissions staff;
- j. An explanation for how the school will remain in compliance on an ongoing basis; and
- k. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

15. ACAST did not demonstrate that:

- The school furnishes a copy of the enrollment agreement to the applicant at the time the applicant signs and furnishes a final copy of the enrollment agreement signed by both parties to the student prior to the student starting class (*Section IV (C)(2)(d), Substantive Standards, Standards of Accreditation*) and
- An enrollment agreement is not binding until it has been signed by the student and accepted by the appropriate school official (*Section IV (C)(2)(e), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team found 7 of 20 active student files were not signed by the accepting school official and therefore an executed copy of the enrollment agreement could not have been furnished to students prior to the students starting class. In response to the June 23, 2024 OER, ACAST provided the school's admissions handbook and information about student acceptance. The Commission found that the process, however, does not clearly indicate that the school furnishes a copy of the enrollment agreement to the applicant at the time the applicant signs and furnishes a final copy of the enrollment agreement signed by both parties to the student prior to the student starting class. Additionally, in response to the concerns regarding recruitment admissions, ACAST indicated that the Registrar is part of the admissions department with a signed code of conduct and also serves as the accepting school official. Conversely, this would appear to be in conflict with *Section IV (A)(13), Substantive Standards, Standards of Accreditation* prohibiting personnel whose primary responsibilities include recruiting and admissions activities to become involved in admission testing or admission decisions, including signing and accepting the enrollment agreement. In addition, while the enrollment agreement includes the School Official's Printed Name, it does not include the title of the school official as required by the ACCSC Enrollment Agreement Checklist. As such, the November 26, 2024 Warning directed the school to provide the admissions policies and procedures specific to signing the enrollment agreement; an explanation for the Registrar's involvement in the admission department, a cross-referenced enrollment agreement, and executed enrollment agreements.

With regard to the Registrar's involvement in the admission department and the person responsible for signing and accepting the enrollment agreement, ACAST stated in response to the November 26, 2024 Warning that the school "was unaware that this was presenting a conflict with the standards, and moving forward will have either the Director of Education or Vice President sign the agreements" (January 23, 2025 ACAST Response, pg. 74). Additionally, the school provided an updated enrollment agreement cross-referenced with the ACCSC Enrollment Agreement Checklist, however, the school has not enrolled any new students since May 2024. The Commission is interested in reviewing the implementation of the updated enrollment agreement and process.

Also in response to the November 26, 2024 Warning, ACAST provided an excerpt from the school's catalog stating that accepted applicants must agree to and sign the enrollment agreement. However, this

response does not provide any policies and procedures specific to furnishing a copy to the applicant at the time the applicant signs and furnishes a final copy after both parties have signed and prior to the student starting class. The January 23, 2025 response states:

As the College continues to get all employees more familiar with the SIS functionality, it was identified that as the enrollment agreement is uploaded to the student's file, it can also be emailed out from there as a way to track and prove that all students were provided a copy of a dually signed enrollment agreement. As the team works to move to more digital records, there is also a push to send out the Enrollment Agreements in advance of orientation, but that requires the approval of the President. If given, this will allow for a fully tracked, digital process (pg. 76).

However, this does not demonstrate that the school has a current process to furnishes a final copy of the enrollment agreement signed by both parties to the student prior to the student starting class, and therefore, is out of compliance with *Section IV (C)(2)(d), Substantive Standards, Standards of Accreditation* and *Section IV (C)(2)(e), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school to submit the following:

- a. A copy of the school's internal admissions policies and procedures beyond the external catalog specific to signing the enrollment agreement, furnishing a copy to the applicant at the time the applicant signs, and furnishing a final copy after both parties have signed and prior to the student starting class;
- b. An explanation for how the school ensures that personnel responsible for recruiting and admissions activities are not involved in admissions decisions including signing and accepting the enrollment agreement;
- c. A copy of the school's enrollment agreement cross-referenced with the ACCSC Enrollment Agreement Checklist;
- d. A list of the 10 most-recently enrolled students in the following chart:

Student ID#	Program	Date Enrollment Agreement Signed by Student	Date Enrollment Agreement Signed by Accepting School Official	Date Executed Enrollment Agreement Furnished to Student	Start Date

- e. Copies of executed enrollment agreements and admissions documentation with the corresponding Student ID# for each of the 10 most-recently enrolled students; and
- f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements.

16. ACAST did not demonstrate that:

- The school has a systemic and evidence-based program evaluation process for each occupational program, or each group of related occupational programs designed to:
 - Evaluate curriculum and course content;
 - Assess the appropriateness of that coursework in relation to program objectives;
 - Assess the adequacy of program equipment and supporting resource materials;
 - Assess student achievement outcomes and program viability; and
 - Make revisions to the curriculum as deemed necessary (*Section II (A)(4)(a)(i-v), Substantive Standards, Standards of Accreditation*).

- The school’s program evaluation process is comprehensive, conducted by faculty and educational administrators regularly, and uses input from internal and external sources including the following:
 - An independent and diverse Program Advisory Committee (“PAC”) for each program area;
 - Student and alumni input collected through sources; and
 - Other resources as useful, needed, and appropriate (*Section II (A)(4)(b), Substantive Standards, Standards of Accreditation*).

At the time of the OSE, the school provided the evaluation team with documentation that the school held a Program Advisory Committee (“PAC”) meeting in 2024. However, outside of this one PAC meeting, the school did not provide the team with documentation of systemic program evaluation.

In response to the June 23, 2024 OER, the school submitted meeting minutes for the May 16, 2024 PAC meeting, however, the meeting predominantly appeared to focus on safety and did not appear address program evaluation. Therefore, the November 26, 2024 Warning directed the school to provide information on the school’s program evaluation process to include PAC meeting information.

As part of the school’s response to the November 26, 2024 Warning, ACAST provided a list of five PAC members. The PAC members include two individuals who work with gateway programs affiliated with JetBlue and SkyWest Airlines. The Commission noted that while feedback from these individuals may be valuable, it questioned whether these individuals were truly independent and external to the school given the positions held by these individuals within the gateway programs and their relationship to the gateway programs. Therefore, the Commission is interested in the details of ACAST’s involvement with JetBlue and SkyWest Airlines and a detailed justification as to how these individuals provide external and independent reviews. Additionally, the school provided the previously submitted May 16, 2024, PAC meeting minutes and noted its attempt to hold a PAC meeting on January 10, 2025. However, the meeting was unable to occur due to the lack of industry partners. The Commission found that the May 16, 2024 PAC meeting did not include a discussion of the appropriateness and adequacy of the program objectives, program length, learning resources or the student graduation, graduate employment, and licensing examination outcomes of each program and therefore, the school is out of compliance with *Section II (A)(4)(a)(i-v), Substantive Standards, Standards of Accreditation*.

Further, the Commission found that as the school “has relied on the Program Advisory Committee meetings to serve as the program review” (January 23, 2025 ACAST Response, pgs. 76-77), ACAST did not demonstrate that the school has a systemic and evidence-based program evaluation process for each occupational program, or each group of related occupational programs designed to evaluate curriculum and course content; assess the appropriateness of that coursework in relation to program objectives; assess the adequacy of program equipment and supporting resource materials; assess student achievement outcomes and program viability; and make revisions to the curriculum as deemed necessary and is therefore out of compliance with *Section II (A)(4)(b), Substantive Standards, Standards of Accreditation*.

As such, the Commission directs ACAST to submit the following:

- a. An explanation of the school’s program evaluation process;
- b. Evidence that the school’s program evaluation process meets accrediting standards as described above;
- c. A list of the school’s Program Advisory Committees (“PAC”) and corresponding members;
- d. A description of the school’s partnership with JetBlue and SkyWest Airlines;

- e. Justification for how the PAC members affiliated with JetBlue and SkyWest Airlines can give independent and external review;
 - f. Written and detailed minutes of all PAC meetings held in 2025, that include:
 - i. A description of all members in attendance (i.e., titles and affiliations);
 - ii. An annotation as to which PAC members represent the employment community, and which are qualified to review delivery of distance education;
 - iii. The date, time, and location of the meeting(s); and
 - iv. A comprehensive and clear description of the review of and commentary made by PAC members in compliance with *Section II (A)(4)(b) & Appendix III, Substantive Standards, Standards of Accreditation*; the school is reminded that PAC review and comment activities must include all items outlined in *Appendix III, Substantive Standards, Standards of Accreditation*; and
 - v. Evidence to show that the school gives consideration to the recommendations of the PAC;
 - g. A schedule for future Program Advisory Committee meetings to be held in 2025; and
 - h. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
17. ACAST did not demonstrate that the school promotes academic integrity and has policies and controls to discourage academic dishonesty (i.e., cheating, plagiarism, etc.) and clearly communicates the consequences of such behavior (*Section VII (A)(2)(d), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that although the school's catalog includes an academic integrity statement, ACAST was unable to provide other documentation demonstrating the implementation of the school's academic integrity policy as listed in the catalog.

In response to the June 23, 2024 OER, ACAST stated that faculty utilize Plagiarism Detector Software and that the school "has a published Student Responsibilities and Standards of Professional Conduct policy that identifies violations of these standards" (July 23, 2024 ACAST Response, pg. 84) along with the school's statement of Academic Integrity. However, the response does not indicate where this statement is published, what policies and controls are in place to discourage academic dishonesty, how the current software is utilized, or the consequences of such behavior.

Additionally, as evidence to document the school's process and control, the school stated that:

The College only has one sample of a plagiarism checking system, which is attached. Previously, cheating was a result of technology in the classroom during exams which is no longer permitted (Id.).

This response seems to indicate that the school was aware of previous academic dishonesty without providing a description of the actions taken at that time. Furthermore, although the response states that technology in the classroom during exams is no longer permitted, there was no documentation provided to demonstrate implementation of this policy.

In response to the November 26, 2024 Warning, ACAST provided information about the school's efforts related to academic integrity. The school stated that currently, each faulty member uses their own preferred plagiarism tool as one has not yet been chosen and implemented at the institutional level. ACAST also stated that technology and personal electronic devices are not allowed in the classroom and that all exams are conducted using paper. In addition, the school provided the "Student Responsibilities and Standards of Professional Conduct" policy that identifies what penalties are associated with cheating and plagiarism at the school. Lastly, the school indicated it has not had any

recent incidents of cheating and was therefore unable to provide evidence of what actions would result and once again did not address the actions taken during previous incidents of academic misconduct at the institution as directed. In response to providing updated evidence of the school's process and control, ACAST stated that the "process and control for academic integrity is under review" (January 23, 2025 ACAST Response, pg. 81).

As the school allows instructors to use their own plagiarism tool, the Commission questions whether the school can reliably ensure consistency in evaluation of cheating and plagiarism. Additionally, it was unclear if there was any training for faculty related to plagiarism especially when they are left to their own decisions related to enforcement of the academic integrity policy. Without the proper institutional controls over academic integrity, the Commission determined that the school is out of compliance with *Section VII (A)(2)(d), Substantive Standards, Standards of Accreditation*.

As such, the Commission directs the school to submit the following:

- a. An updated description of the school's efforts to promote academic integrity;
 - b. A copy of the school's policies and controls for academic integrity;
 - c. An explanation regarding the school's previous cheating along with documentation of action taken and the results of action taken;
 - d. An explanation and associated documentation for any training faculty have received related to evaluating student work for academic misconduct;
 - e. Evidence of the school's process and control; and
 - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
18. ACAST did not demonstrate that the school has established appropriate criteria (e.g., comparability, applicability, source, and age of the previously earned credit; academic preparedness of the student at the time of credit transfer; grade earned for the credit to be transferred; etc.) and that the school applies a systematic, consistent process for determining whether to accept credit earned at other institutions for transfer (*Section II (A)(10)(a)(i), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the team found that the institution awards transfer credit for courses that do not appear to align to the school's courses. For example, the school awarded a student general education transfer credit for Music Composition even though this course does not align to the school's required general education course requirements. In addition, the on-site evaluation team noted examples where a student may only have 3 or 4 courses to transfer but were awarded credit for all 8 general education courses.

The July 23, 2024 response states that:

In response to the inappropriate awarding of credit hour, the former Registrar was not properly trained on the application of transfer credit, and once trained and provided the list above from the Director of Academic Affairs began a more appropriate evaluation process (Id.).

The school's response also states that the Registrar is part of the admissions department with a signed code of conduct and the person responsible for signing the enrollment agreement, which may create a conflict.

In addition, the transfer credit policy as listed in the catalog states that "[i]n some cases, credit will not be given for courses completed more than ten years before Aviator enrollment" (*Id.*, pg. 86). However, the policy does not include criteria for when courses completed more than 10 years prior would be eligible for transfer credit and therefore it is unclear that the school has established appropriate criteria

for transfer credit. In addition, the transfer credit policy indicates that “to receive credit for flight hours, applicants must have their logbook evaluated by the chief pilot” (*Id.*); however, the documentation provided only includes a notation from the registrar on the transfer credit form. Additionally, the transfer credit documentation seems to indicate that the review of transfer credit was completed after the start date of the program, in some cases over a year past enrollment, which appears to conflict with the school’s policy that states “all anticipated transfer credits must be reflected in your enrollment agreement” (*Id.*, pg. 86). As such, the November 26, 2024 Warning directed the school to submit updated information on the school’s transfer of credit policies.

In response to the November 26, 2024 Warning, ACAST noted that the school has not made any changes to the transfer credit policy and provided a copy of the policy as stated in the catalog. In addition, the school stated that the “transfer credit alignment map is being resubmitted, but the new Registrar has not yet fully reviewed it for improvement recommendations” and that a review of the Florida College Transfer Guides “will be conducted for inclusion in the May 2025 catalog update” (January 23, 2025 ACAST Response, pg. 85). Although the school has not enrolled any new students and therefore does not have documentation of transfer credit application, based on the lack of an internal policy and continued review of other agency requirements, the Commission determined that ACAST has not yet established appropriate criteria for transfer credit and is not in compliance with *Section II (A)(10)(a)(i), Substantive Standards, Standards of Accreditation*.

Therefore, the Commission directs the school to provide the following:

- a. A copy of the school’s transfer credit policies and procedures to include the timing of transfer credit within the enrollment process along with any changes since the January 2025 submission, as applicable;
- b. An explanation regarding how the school has established appropriate criteria and applies a systematic, consistent process for determining whether to accept credit earned for transfer;
- c. An update on the review of other agency requirements as part of the school’s policy;
- d. An explanation for the school’s process for flight hour transfer credit;
- e. Documentation of the school’s training on transfer credit;
- f. A list of any student who has received transfer credit since the training of the registrar;
- g. Documentation of the transfer credit for each of the students listed in (e.) above;
- h. A transcript for each of the 10 students listed in (f.) above;
- i. The school’s alignment map for transfer credit awards; and
- j. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.

19. ACAST did not demonstrate that:

- The use of the learning resource system (“LRS”) materials are integrated into a school’s curriculum and program requirements as a mechanism to enhance the educational process and to facilitate positive learning outcomes for students (*Section II (A)(6)(c), Substantive Standards, Standards of Accreditation*) and
- Qualified personnel orient, train, and assist students and faculty in the use of the learning resource system in a manner that supports learning objectives (*Section II (A)(6)(e), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team noted that much of the materials in the learning resource system appeared to be outdated and no longer relevant to the industry. Although the school has a dedicated library/learning resource system staff person, the school did not provide the on-site evaluation team with documentation demonstrating orientation, training, and assistance for students and faculty. In response to the June 23, 2024 OER the school provided a syllabus for a sociology course that references the library as an academic resource, a library handout provided to students at orientation, and the policies and procedures for the library. While these items appear to communicate the existence of the library to students there does not appear to be integration of the LRS in the school's curriculum and the on-site evaluation team's concern about the out-of-date age of the materials appeared to go unanswered. The November 26, 2024 Warning directed ACAST to submit information on how the school integrates use of the learning resource system materials into the school's curriculum and to provide documentation demonstrating the orientation, training, and assistance provided for the students and faculty in the use of the learning resource system.

In its January 23, 2025 Warning response, the school provided a plan but did not submit any documentation of its implementation. The school did offer an example of a single homework assignment from an Aviation Meteorology course for students to engage with the LRS, as well as an orientation document outlining the resources available in the school's Library and Resource Center. However, since the school has not provided documentation showing that the LRS has been fully integrated into the curriculum for all offered programs or that students have been adequately oriented to the LRS, ACAST is out of compliance with *Section II (A)(6)(c), Substantive Standards, Standards of Accreditation* and *Section II (A)(6)(e), Substantive Standards, Standards of Accreditation*.

As such, the Commission directs ACAST to submit the following:

- a. An explanation for how the school integrates use of the learning resource system materials into the school's curriculum and program requirements;
 - b. Copies of syllabi and of student work to demonstrate that students utilize the school's learning resource system as required for all courses of study;
 - c. Documentation of orientation, training, and assistance provided for the students and faculty in the use of the learning resource system;
 - d. Copies of any orientation/training materials for the students and faculty regarding the school's learning resource system; and
 - e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
20. ACAST did not demonstrate that the school has a process for student's to request a leave of absence, for the school to approve such a request, and that if a student does not return following a leave of absence the school will a) terminate the student and b) apply the school's refund policy in accordance with the applicable and published requirements (*Section VII (A)(3)(c)(i & iii), Substantive Standards, Standards of Accreditation*). The on-site evaluation team reviewed a case in which a student did not return from an approved leave of absence and where the school failed to follow its policy as published in the school catalog to drop the student. In addition, the on-site evaluation team found that the school does not consistently follow its policy to collect back-up documentation for students requesting a leave of absence in the following circumstances: serious medical illness/condition, death of a family member, call to active military, change in employment status, financial hardship, and emergency situations as required by the school's policy. In response to the June 23, 2024 OER, the school did not clearly demonstrate the implantation of a new policy as the school granted leaves of absence for a "family reunion" and "vacation" that appeared to conflict with the school's policy that "an LOA will not be granted for any of the following reasons" to include "vacation or personal travel" (July 23, 2024

ACAST Response, pg. 89). As such, the November 26, 2024 Warning directed the school to submit updated information regarding leaves of absence.

In response to the November 26, 2024 Warning, ACAST provided a leave of absence policy as published in the school's catalog. The policy includes a list of reasons an LOA may be granted and an accompanying list of reasons an LOA would not be granted. The school also included LOA requests from 24 students. The Commission again noted that five accepted requests list the reason of vacation/holiday/travel and four with no reason given. Additionally, ACAST provided no backup documentation per the school's LOA policy for those individuals whose reason for needing an LOA required backup documentation. Given that the policy provided by ACAST explicitly states that vacation and personal travel will not result in a granted leave of absence and that the Commission had previously identified this issue in the OSE report, yet the school continued to grant LOAs for students with these reasons, the Commission found ACAST out of compliance with its own policy and also out of compliance with *Section VII (A)(3)(c)(i & iii), Substantive Standards, Standards of Accreditation*.

As such, the Commission directs ACAST to submit the following:

- a. The school's current leave of absence policy highlighting any revisions since the January 2025 submission;
 - b. The school's internal protocol for approving a leave of absence;
 - c. Copies of completed forms for all students who have requested a leave of absence since the January 23, 2025 submission and
 - d. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's leave of absence requirements.
21. ACAST did not demonstrate that the school discloses the graduation rate, graduate employment rate, and as applicable licensure certification examination pass rate for each program offered as last reported to the Commission and that the disclosure for each program's graduation rate, graduation employment rate, and licensure/certification examination pass rate includes the program population base and timeframe upon which each rate is based (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). Previously, the on-site evaluation team found that the school was not disclosing the correct rates on the school website. The November 26, 2024 Warning directed the school to provide the current disclosures along with an explanation for how the school ensures the disclosures will remain current.

In response to the November 26, 2024 Warning, ACAST provided a link to the consumer information section of the school's website where it has posted the graduation and employment rates. However, the rates were not the same as those which the school has reported to the Commission. The Commission requires that the rates disclosed by the school be the most recent rates reported to the Commission. The response includes a link to the school's website where the report rates from the 2024 Annual Report were posted. However, as those were not the most recent rates reported to the Commission, the school is out of compliance with *Section IV (C)(3), Substantive Standards, Standards of Accreditation*.

As such, the Commission directs ACAST to provide the following:

- a. An explanation as to how the school determines the Graduation, Employment, and Licensure rates it discloses and ensures it remains current;
- b. Supporting documentation showing that the school currently discloses graduation and graduate employment rates as last reported to the Commission; and

- c. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
22. ACAST did not demonstrate that all advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any misleading, misrepresenting, or exaggerated impressions with respect to the school or its training (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school was utilizing advertising statements that appeared to include exaggerated claims as well as a name inconsistent with the school name approved by ACCSC. In response to the June 23, 2024 OER, the school stated the exaggerated phrases and references to the misaligned name had been removed. In addition, the school included its advertising policy which includes a step where the vice president of the college must review job-related postings, press releases, photographs, and information shared on employee's personal social media pages prior to publication. Additionally, the school provided links to social media pages on Facebook and YouTube; however, upon review of the linked pages the Commission found that advertising featured pictures of planes that were not similar to the school's current fleet. As such, the November 26, 2024 Warning directed the school to provide resolution to the advertising concerns along with documentation of any actions taken.

In response to the November 26, 2024 Warning, ACAST stated that all advertising, marketing, and promotion of the school has been suspended. In addition, ACAST stated that the Vice President is the only person who has access to social media posting and has limited these posts to celebrating student achievements. Additionally, the school has not yet drafted a policy related to advertising/marketing/promotion due to the pause in advertising. The school did not appear to address the concerns related to photographs on the school's website. As the school has no policy and procedure related to advertising the Commission could not find the school in compliance with *Section IV (B)(1), Substantive Standards, Standards of Accreditation*.

As such, the Commission directs ACAST to submit the following:

- a. Any updates made to creating policies and procedures pertaining to advertising/marketing/promotion of the school;
- b. A summary of a comprehensive review the school has completed related to all public facing advertising, including the school's website, and social media pages, to ensure all pictures, claims, and statements are truthful and accurate to the programs and equipment offered at the school;
- c. An explanation related to how the photographs on the school's website are accurate to the program equipment offered at the school;
- d. A description regarding any actions taken (i.e. language removed, language revised, etc.) by the school to address each of the items listed above as well as anything the school discovered when reviewing advertising;
- e. Documentation demonstrating that the school removed and/or replaced any misleading items from all advertising and promotional materials to include the URL of the school's website, links to the school's social media platforms, and copies of current advertising materials to reflect any revisions made by the school;
- f. If the school determines that more accurate statements can be used to convey the intended messages, the Commission directs the school to provide the following:
 - i. Evidence that the school removed the aforementioned claims and phrases from all advertising and promotional materials;
 - ii. Evidence that all advertising making references to scholarships or financial aid include an eligibility phrase; and

- iii. Copies of website and advertising materials to reflect the revised phrases and claims; and
 - g. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
23. As the main school bears ultimate responsibility and accountability for its branch campus (*Section VIII (B)(1), substantive Standards, Standards of Accreditation*),¹⁰ ACAST did not demonstrate that its branch campus located in Kissimmee, Florida is adequately managed in accordance with the requirements of *Section I, Substantive Standards, Standards of Accreditation*.¹¹ Based on the nature and extent of the findings associated with the branch campus's June 23, 2024 OER response, along with the shared resources between the campuses located 100 miles apart, the Commission questioned whether ACAST provides the necessary management and administrative oversight to operate a branch location in compliance with accrediting standards. As such, the November 26, 2024 Warning directed the school to provide an assessment of the operation of the branch campus and provide information on the oversight.

In response to the November 26, 2024 Warning, ACAST provided the estimated hours by shared positions to include President [REDACTED] daily contact, regular contact with [REDACTED], and monthly oversight by the Director of Academic Affairs. Additionally, ACAST indicated that the Director of Financial Aid is on-site for new student orientations, funding audits, and training opportunities and completes the packaging with the branch-based assistant. The Human Resources support is a new hire and the "scheduled times of her being on campus has yet to be determined" (*Id.*, pg. 96). While ACAST provided the amount of time spent at each campus, the response does not provide a justification as how these arrangements contribute to and in fact do not dilute the adequacy of the management and administrative capacity of each campus.

In response to a description of any management lapses that have impacted the branch campus's ability to demonstrate compliance with accrediting standards, ACAST identified the absent campus director as the primary lapse with a secondary issue of "adopting many of the same practices that were used at the main campus" (*Id.*, pg. 96). This is of particular concern given the number of findings that remain as referenced in this Probation. In addition, ACAST did not provide an explanation of the changes the school intends to make as a result of the assessment of management, only noting the new Vice President of Campus Operations. Based on the number of findings contained in the branch campus Probation, the Commission found ACAST out of compliance with regard to its ability to adequately manage the branch campus (*Section VIII (B)(1), substantive Standards, Standards of Accreditation*).

Therefore, the Commission directs ACAST to submit the following:

- a. An updated description as to the school's oversight of the Kissimmee branch campus facilities to include which positions are shared with both campuses and the amount of time spent at each campus along with a justification as to how these arrangements contribute to and in fact do not dilute the adequacy of the management and administrative capacity of each campus;
- b. A description of any management lapses that may have impacted the branch campus's ability to demonstrate compliance with accrediting standards;
- c. An explanation of the changes ACAST intends to make as a result of the assessment of management; and

¹⁰ A main school is responsible and accountable to the Commission for its separate facilities and is responsible and accountable for compliance with accrediting standards by its separate facilities. The main school bears ultimate responsibility for compliance with accrediting standards by its separate facilities. Failure of the branch campus to operate in compliance with accrediting standards may be grounds for the main school to have its accreditation withdrawn.

¹¹ ACAST in Kissimmee, Florida has also been placed on Probation.

- d. Any additional information that the school believes will assist the Commission in determining that ACAST provided sufficient support and management of the branch campus.

Areas of Continued Concern:

24. ACAST must demonstrate that the school's physical facilities are sufficient to create an effective and suitable learning environment (e.g., resources, safety, etc.) (*Section I (G)(2), Substantive Standards, Standards of Accreditation*). The Commission previously found that ACAST was prioritizing safety initiatives including facility improvements and had earned a minimal amount of trust with regard to safety following the noted incidents.

ACAST noted that the school renovated a break room for flight instructors, contracted for improvements on the campus' green space, and that the new maintenance hangar organization has led to increased student engagement with maintenance (including maintenance staff participation in pre or post flight assessment) and increased student understanding of aircraft maintenance. ACAST sent a survey out to students asking for feedback on campus facilities and is looking to use that feedback during the school's annual assessment period from February 1 to April 3, 2025. The Commission acknowledged ACAST's initiatives and is interested in the results of the survey and any additional improvements the school seeks to make following its annual assessment period.

Accordingly, the Commission directs ACAST to provide the following:

- a. A copy of the results from the referenced survey;
 - b. A description of any changes or initiatives regarding the school's facilities;
 - c. Documentation of any changes or initiatives regarding the school's facilities; and
 - d. Any other information the school believes will assist the Commission in making a determination regarding the school's compliance with accrediting standards.
25. ACAST must demonstrate that all machinery and equipment is properly maintained and provided with proper safety devices, which are in working order and used whenever the machinery and equipment is operated (*Section II (A)(5)(d), Substantive Standards, Standards of Accreditation*). The Commission previously found that ACAST was prioritizing safety initiatives including equipment upkeep and had earned a minimal amount of trust with regard to safety following the noted incidents.

ACAST noted that its maintenance department kept at least 34 of 38 aircraft available for training, maintained the school's simulators, and freshly painted the hanger floor. One complainant (██████████) additionally referenced "a noticeable improvement in upkeep and maintenance of the school's aircraft following the accident earlier this year" (November 12, 2024 Warning, pg. 5). ACAST also noted that the school replaced its emergency equipment and continued to conduct testing on fire-detection devices and provided an aircraft inventory and photos of the school's hanger and maintenance areas. The Commission acknowledged ACAST's efforts in this area and is interested as to whether ACAST can consistently maintain this record of aircraft uptime.

Accordingly, the Commission directs ACAST to provide the following:

- a. An update as to the month-by-month availability of aircraft from the time of the school's last response to the school's response to this letter;
- b. An update on all safety implementations;
- c. Documentation of all equipment-related safety implementations as described in (b.) above; and

- d. Any additional information the school believes will assist the Commission in making a determination on the school's compliance with accrediting standards.
26. ACAST must demonstrate that the school has and adheres to a policy and procedure for fairly and consistently handling and addressing student complaints (*Section VI (D)(1), Substantive Standards, Standards of Accreditation*). The on-site evaluation team previously noted that the school's catalog did not contain an updated ACCSC Student Complaint/Grievance Procedure as contained in the ACCSC Complaint Review Process Form (*Section VI (D)(4), Substantive Standards, Standards of Accreditation*). ACAST provided documentation of an updated catalog. The on-site evaluation team also noted that ACAST did not demonstrate the school's maintenance of a complete record of all written complaints (*Section IV (D)(3), Substantive Standards, Standards of Accreditation*).

In response to the June 23, 2024 OER, ACAST provided a list of ongoing or closed complaints. Given the anonymous complaints received by the Commission, the Commission reviewed the provided complaints and is interested in additional information regarding how the school adheres to its policy of addressing student complaints. The anonymous complaint dated April 29, 2024 appears to echo this concern, alleging the indifference of the school's owner and the administrative staff regarding student concerns. ACAST's July 3, 2024 response details the school's solutions to complaints received since March 30, 2024. The response also notes the creation of a "formal Student Complaint Process to comply with *Section VI – Student Services*" (ACAST July 3, 2024 Response, pg. 40).

The November 26, 2024 Warning directed the school to submit information of each complaint received by the school since August 1, 2024. In response, ACAST indicated that the school has not received any complaints nor any submissions to the Student Safety Concerns reporting portal. Nevertheless, given the totality of the issues included in this Probation, the Commission remains interested in the ongoing review of the school's record of addressing complaints and in the school's formal process; particularly as there is a perception that complaints are not addressed or effective.

Based on the foregoing, the Commission directs ACAST to submit the following:

- a. A record of each complaint received by the school since January 1, 2025 and the status of each (e.g., pending review, in review, pending decision, resolved, etc.);
- b. For each resolved complaint, an explanation of the resolution;
- c. A record of each submission to the Student Safety Concerns reporting portal and the status of each (e.g., pending review, in review, pending decision, resolved, etc.);
- d. For each submission to the reporting portal, an explanation of the resolution; and
- e. Any additional information ACAST believes will assist the Commission in determining the school's compliance with accrediting standards.

Participation in the process of accreditation is voluntary on the part of the school. However, schools seeking to maintain accreditation agree to support the accreditation process and to meet or exceed the *Standards of Accreditation* throughout the application and accreditation period. The burden rests with the school to show that it is meeting its mission, serving students, and meeting all requirements of the *Standards of Accreditation* in order to maintain ACCSC accreditation. That the school's staff have chosen to, in some notable cases, abdicate that burden leaves the Commission to find the school out of compliance both with those associated areas but also with fundamental requirements of the accreditation process and standards. Because the burden rests with the school to establish that it is meeting accrediting standards, a school must supply the Commission with complete information and documentation showing the school's compliance with all accrediting standards if the school is to maintain accreditation.

CAP ENROLLMENT DIRECTIVE:

At the November 2024 meeting, the Commission voted to cap ACAST's Enrollment at 112 students in the Aeronautical Science (AOS) degree program and 35 students in the Commercial Pilot (Certificate) program (147 total students). If the school's current enrollment as of the date of this letter exceeds the enrollment caps, then the school may continue to train all currently enrolled students. However, the school cannot add new students in excess of 147 students. ACAST's January 23, 2025 Response states:

After a line-by-line audit of each record, the College needs to amend some data provided to the Commission in the 2024 PES regarding active students as of June 30, 2024, in both the Associate Degree and Commercial Pilot Programs

The following chart provides the original submission, amended totals, and the identified variance in the number of students enrolled as of 6/30/2024. The PES submission did not contain any errors regarding graduate and withdrawal totals (pg. 6).

ACAST also included a chart identifying these variances as follows:

Program	2024 Program Enrollment Summary Submitted Totals	Actual Enrollment	Difference
<i>Associate Degree</i>	<i>123</i>	<i>129</i>	<i>+6</i>
<i>Commercial Pilot</i>	<i>36</i>	<i>49</i>	<i>+13</i>

The Commission considered the variances described by ACAST and voted to continue to cap ACAST's Enrollment at 112 students in the Aeronautical Science (AOS) degree program and 35 students in the Commercial Pilot (Certificate) program (147 total students).

PROBATION REQUIREMENTS:

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

The Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is on Probation. However, a school that is subject to Probation may seek the Commission's approval for the transfer of accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation (Section VII (L)(6) Rules of Process and Procedure, Standards of Accreditation)*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies.

TEACH-OUT PLAN REQUIREMENT:

Given the serious nature of the issues outlined herein, the Commission directs the school to provide an [Institutional Teach Out Plan Approval Form](#), which must be submitted as part of the response for the items listed above.

MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:

According to *Section VII (M), Rules of Process and Procedures, Standards of Accreditation*, where the Commission has found an area in which the school is out of compliance with accreditation standards or requirements, the Commission allots the maximum timeframe for the school to remedy the noncompliance or cure the deficiency. Given the scope and range of the concerns cited herein coupled with the fact that the school is already more than 12 months beyond its next accreditation date (February 2024), the maximum timeframe allowed for ACAST to achieve and demonstrate compliance with the *Standards of Accreditation* ends on **March 19, 2026** unless the school can demonstrate good cause exists to extend this timeframe pursuant to *Section VII (M)(2), Rules of Process and Procedures, Standards of Accreditation*.

Also, please be advised that pursuant to these *Rules*, the Commission is not required to allow the maximum time frame to remedy noncompliance in all instances. The Commission may establish shorter time frames as deemed appropriate (e.g., if additional safety concerns were to become apparent), including taking immediate adverse action at its next meeting if the school does not demonstrate significant improvement in its compliance with the accrediting standards cited in this letter *Section VII (M)(5), Rules of Process and Procedures, Standards of Accreditation*.

NOTIFICATION TO STUDENTS:

Within **seven days** of receipt of the Probation notification and for the duration of that action, the school must:

- a. Inform current and prospective students in writing that the school has been placed/continued on Probation and provide such notice on the school's website;
- b. Provide a summary that accurately describes the reasons for the Probation; and
- c. Provide the uniform resource locator (URL) where that action can be obtained from the Commission's website.

The school must **within seven days** inform current and prospective students in writing that the school has been continued on Probation, provide a summary of the reasons for the Probation, and indicate where that action can be obtained from the Commission's website. (*Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*). As part of the school's response to this Probation, please provide a copy of the required notice provided to students.

RESPONSE REQUIREMENTS:

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

Aviator College of Aeronautical Science & Technology must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.¹² If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the

¹² ACCSC has resources for submitting a well-documented and organized response for Commission consideration. As a reminder *Section I (H)(1) Rules of Process and Procedure, Standards of Accreditation*, states that all submissions and notifications must be organized as required by the *ACCSC Instructions for Electronic Submission*. More information is available on the [ACCSC website](#) under [Resources](#) and [Forms and Reports](#).

Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

Aviator College of Aeronautical Science & Technology must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for College 360 DMS Submissions can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before June 13, 2025**. If a response, the required fee,¹³ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 13, 2025**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED]
[REDACTED]

Sincerely,

[REDACTED]
[REDACTED]
Executive Director

c: [REDACTED]

¹³ ACCSC assesses a \$1,000 processing fee to a school placed on Probation.